

# 2006 Homeless Assistance Fund Management Guide



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# Introduction

## Welcome to the IFA Homeless Assistance Program

### The Purpose of this Manual

Homelessness is a growing problem in Iowa. The Iowa Finance Authority (IFA) administers two grant programs that provide funds to support the activities of organizations that provide services to the homeless:

- 1) the Emergency Shelter Grants Program (ESGP); and
- 2) the Homeless Shelter Operations Grant Program (HSOGP)

This manual has a dual purpose. First, it is intended to provide general information about the homeless programs. Second, it is intended to serve as the basic administrative reference guide for organizations that are funded through these programs.

Homeless program recipients are encouraged to become familiar with this manual to ensure full compliance with all the provisions applicable to each program. IFA tries to award funds to recipients under only one program, rather than under both sources, whenever possible to help reduce potential administrative burdens. If you are awarded funds, IFA will notify you as to which program will fund your agency. You should then pay special attention to Chapter 2 or Chapter 3, whichever funding source you are receiving.

### Manual Format

This manual is divided into seven chapters:

- 1) Introduction
- 2) Emergency Shelter Grants Program
- 3) Homeless Shelter Operations Grants Program
- 4) Starting a Contract
- 5) Drawing Funds
- 6) Contract Amendments
- 7) Contract Closeout

Appendices at the end of this document contain referenced forms and materials.

## Technical Assistance

While this Manual is intended to provide the information you need to manage a homeless grant, you may encounter problems or have questions you don't find addressed here. Do not hesitate to call IFA for additional assistance. IFA staff members are available to help you. The following staff members may be of particular assistance in the specific areas listed:

- **Lyle Schwery, State Homeless Coordinator:** Responsible for daily operation of programs. Can provide assistance on compliance issues, contract amendments and other general program requirements. *Phone:* (515)242-4942; *Fax:* (515)242-4957; *e-mail:* [lyle.schwery@iowa.gov](mailto:lyle.schwery@iowa.gov).
- **Julie Eberbach, Program Support Staff:** Monitors program compliance, maintains ServicePoint program data and is available to assist with other aspects of the programs. *Phone:* (515)246-6643; *Fax:* (515)246-6637; *e-mail:* [julie.eberbach@aol.com](mailto:julie.eberbach@aol.com).
- **Karen Winchester, Data Analyst:** Can provide technical assistance with requests for program funds. *Phone:* (515)242-5082; *Fax:* (515)242-4957; *e-mail:* [karen.winchester@iowa.gov](mailto:karen.winchester@iowa.gov).
- **Rita Eble, Environmental Review Specialist:** Can provide technical assistance on complying with ESGP environmental regulations. *Phone:* (515)242-4852; *Fax:* (515)242-4809; *e-mail:* [rita.eble@iowalifechanging.com](mailto:rita.eble@iowalifechanging.com).

## Applying for Homeless Grants

### Eligible Applicants

Any nonprofit organization (public or private) that provides for the needs of homeless individuals or any city or county government engaged in similar activities is eligible to apply for homeless assistance funds. Eligible activities include overnight shelters, meals, food pantries, medical care, legal assistance, transitional housing, counseling, or referral to other services.

### The Application Process

Applications for IFA Homeless Grants are accepted annually. In early September of each year a notification of funding availability is sent to homeless service providers that are identified on a mailing list maintained by the IFA.

If you have not received a notification in the past, contact Karen Winchester at (515)242-5082 to ensure you will be included in future mailings.

Applications are mailed to organizations that respond to these notifications. In the fall of each year, IFA conducts application workshops to assist applicants in completing the application forms. Applications normally are due in December.

Applications are reviewed individually by the IFA staff and representatives of other homeless assistance programs. Grant awards are usually made by May of each following year. All applicants are notified of funding decisions by mail.

## Grant Period

IFA homeless grant contracts begin on July 1<sup>st</sup> and end on June 30<sup>th</sup> of the following year. It is possible to extend the grant period if necessary (refer to Chapter 6).

## Eligible Activities

### Rehabilitation and Renovation

- Minor repair or upgrades to existing homeless service provider facilities;
- Emergency repairs to facilities mandated by local fire and safety regulations (e.g., replacing a roof, installing electric wiring, plumbing repairs and other structural repairs or upgrades).

For rehabilitation activities that cost more than \$10,000, you are encouraged to investigate funding through the CDBG or HOME programs administered by IDED. Contact Diane Foss at 515/242-5907 for more information.

### Essential Services

- Salaries for new or expanded services (that can be documented in the application) to homeless clients. (e.g., new medical services such as a physician or nurse, new counseling services or a new food pantry or clothing disbursement program).

### Operations

- Staff salaries – limited to 10 percent of grant amount
- Rent payments for a facility
- Insurance payments for a facility
- Utility payments for a facility
- General maintenance for a facility including maintenance staff (not limited to the 10 percent salary limit)
- Furnishings for a facility
- Security staff – not limited to the 10 percent salary limit
- Any other documented normal operating expenditures for the facility

### Homelessness Prevention

- One-time rent or utility payment to keep an individual from being evicted from his or her current residence
- Counseling services to prevent a client from becoming homeless
- Client advocacy services to assist clients with legal or medical problems that could cause them to become homeless
- Day care services for the children of homeless clients who are seeking employment or a residence

### Homeless Client Verification Form

Clients receiving services from these grant funds must be homeless or near homeless. A sample verification form is found in the appendix of this manual. This form can be used to verify that clients are eligible for services funded through these grant funds. (See Appendix 1)

- **HUD ESG Deskguide Section 3** can be found in the Appendices of this Manual. Please refer to this Deskguide for a more detailed explanation of eligible (and ineligible activities) that may be funded through Iowa's Homeless Assistance Program.

## Chapter 2

# Emergency Shelter Grants Program

## ESGP Funding

### Overview

The Emergency Shelter Grants Program (ESGP) is funded through the U. S. Department of Housing and Urban Development (HUD). It is intended to provide support funding for nonprofit providers of services to the homeless. IFA is responsible for funds allocated for the State of Iowa. In addition to these funds, HUD makes direct allocations to the cities of Des Moines and Sioux City. Contact persons in these cities are as follows:

- Des Moines: Caroline Gathright (515/283-4151)
- Sioux City: Abbey Gaffey (712/279-6255)

Providers in these cities may receive both city and state ESGP funds.

ESGP funds can be used for eligible activities as outlined in Chapter 1 of this manual.

### Unique Features of ESGP

#### Rehabilitation

For rehabilitation activities undertaken with ESGP funds, the following requirements outlined in environmental clearance, contractor clearance, and procurement apply:

- Environmental Clearance

Grantees must comply with federal environmental regulations. More information about this process appears in the appendices of this manual. Further information can be obtained by contacting Rita Eble of IDED at (515)242-4852; email: [rita.eble@iowalifechanging.com](mailto:rita.eble@iowalifechanging.com).

- Contractor Clearance

Contractors hired to perform the rehabilitation work must be cleared and approved in writing by IDED before rehabilitation activities begin. Contact Christine Zimmerman at (515)242-4825 or email [christine.zimmerman@iowalifechanging.com](mailto:christine.zimmerman@iowalifechanging.com) to obtain this clearance.

- Procurement

Providers must solicit bids from more than one contractor. If two or more bids are not received, the provider must document to IDED that an attempt was made to solicit multiple bids, but only one was received.

## Essential Services

Essential service activities are limited to the cost of staff salaries and other expenses related to a **new or expanded** service that is documented in an application for funds.

## Homeless Prevention

For agencies providing homeless prevention services with ESGP funding, the requirements of HUD regulation 24 CFR 577.21(a)(4) apply:

Funding of homeless prevention activities for families that have received eviction notices or notices of termination of utility services must meet the following requirements:

- The inability of the family to make the required payments;
- The assistance must be necessary to avoid eviction of the family or termination of the services to the family;
- There must be a reasonable prospect that the family will be able to resume payments within a reasonable period of time; and
- The assistance must not supplant funding for preexisting homeless prevention activities from any other source.

## Operations

Operation activities include maintenance, insurance, operating salaries (10% CAP), utilities, and furnishings.

## Local Match Requirement

ESGP has a dollar-for-dollar local match requirement. This means that providers funded through the ESGP must identify other resources that are at least equal to the amount funded by the ESGP that will be utilized to provide service to their homeless clients. Local match may take many forms, including cash, value of the property, donations, contributions, non-federal grants or awards, staff salaries, and voluntary hours (which for ESGP purposes are valued at \$5 per hour with a couple exceptions as noted in the HUD Desk Guide).

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# Homeless Shelter Operations Grants Program

## HSOGP Funding

### Overview

The Homeless Shelter Operations Grants Program (HSOGP) is a program developed to support providers of services to the homeless. The program is funded through State of Iowa funds, and as such is not subject to many federal regulations that are applicable to the Emergency Shelter Grants Program (ESGP).

### Unique Features of the HSOGP

#### Rehabilitation

HSOGP funds spent for renovation and/or repair of a facility are exempt from federal environmental review regulations, however the \$10,000 limit of funding for this activity still applies.

#### Procurement

Providers must solicit bids from more than one contractor. If two or more bids are not received, the provider must document to the IDED that an attempt was made to solicit multiple bids, but only one was received.

#### Salaries

Salaries funded through the HSOGP are subject to the same limitations as ESGP.

#### Local Match

There is no local match requirement for recipient of HSOGP funds, but agencies are encouraged to leverage these funds.



## Starting a Contract

### Required Documents and Processes

#### Notification

After funding decisions are made, IFA will notify all applicants whether funding has been approved or denied. Approved funding letters contain the following information:

- The amount and source of funding that has been approved
- The activities to be funded
- The starting date and ending date of the contract

#### Documents to Be Returned to IFA

Shortly after issuing letters of approved funding, grantee packets will be mailed to the administrative entities. In some cases, city or county governments will be designated as administrators of contracts for multiple providers located within their geographic area. Otherwise, the packet will be mailed to individual service providers. The following documents must be executed and returned to IFA before the contract can go into effect. Examples of these documents can be found in the Appendix 1 of this manual.

Document	Program	Action Needed
Contract	ESGP, HSOGP	Signed by mayor, county chairperson, or director
Signature Authorization	ESGP, HSOGP	Signed by <u>both</u> the mayor, county chairperson, or director <u>and</u> the person who will be signing the forms to request funds
Disclosure Form	ESGP	Signed by mayor, county chairperson, or director for a service provider.
Environmental Documents Request for Release of Funds	ESGP	Signed by mayor or county chairperson
Provider Homeless Assistance Grant Subagreement	ESGP, HSOGP	Signed by mayor or county chairperson, <u>and</u> provider
Vendor ID Form	ESGP, HSOGP	Signed by mayor, county chairperson, or director

Provider ServicePoint Compliance Certification	ESGP, HSOGP	Signed by provider
HMIS Required Minimum Data Set and Confidentiality Certification	ESGP, HSOGP	Signed by service provider (appropriate staff)

## The Contract

The original contract must be signed and returned to IFA. In most cases, IFA's Executive Director will sign the contract before it is mailed. If so, you should make a copy of the fully executed contract for your records before returning it to IFA. If not, you should sign the contract and mail it back as soon as possible; a copy of the fully executed contract will be sent to you.

## Signature Authorization Form

The "authorized signature" is established when the contract is signed. If you want another person to be able to sign official documents related to the contract, or if someone other than the original signatory takes over as CEO, you must complete the Alternate Signature Authorization or the Signature Authorization for Change in CEO form.

## Disclosure Form

Grantees funded through the ESGP are required to complete the Applicant/Recipient Disclosure Form and return it to IFA. The form requests information on the use of HUD federal funds. If ESGP funds are used for a construction project and if the total amount of HUD federal funds to be used is \$200,000 or more, the form must be fully completed. Very few ESGP projects meet these criteria. However, the form must still be on file with IFA. Simply mark NO to the two questions in Part 2, sign the form and return it to IFA.

## Environmental Statement ( ESGP Funds Only)

As an ESGP recipient, you have taken on the responsibility to evaluate how your activity will affect the environment by complying with the federal requirements for the environmental review process. You must certify that the use of these funds will meet federal environmental regulations. Most projects awarded under these funds will be exempt or categorically excluded. Forms can be found in the Appendix 1 of this manual.

Contact Rita Eble of the IDDED, (515)242-4852, email: [rita.elbe@iowalifechanging.com](mailto:rita.elbe@iowalifechanging.com) for additional information.

## Subagreements

All grantees must have a subagreement signed and on file with each homeless service provider that is covered through an ESGP or HSOG contract. A copy of this subagreement must be mailed to the IFA. A sample subagreement is included in the Appendix 1.

## Vendor Identification

All grantees must sign and submit to IFA.

## Provider ServicePoint Compliance Certification

All providers funded in the previous year must complete and submit this to IFA. A copy of the document is provided in Appendix 1.

# Chapter 5

## Drawing Funds

### How to Request Funds for Expenditures

#### Overview

You may begin to expend awarded funds on the start date of your contract. Grant funds cannot be used to pay for expenditures prior to that date. The environmental process must be completed for ESGP grantees before funds are drawn.

To request a draw of funds, you must submit an original and two copies of the State of Iowa General Accounting Expenditure Form. (See Appendix 2) **You should retain a copy of all material submitted for your records.**

Funds must be requested in whole dollar amounts not less than \$500. Processing a draw request generally takes two to three weeks. Therefore, plan ahead and draw your funds as needed. A final draw must be submitted and received by IFA within 60 days of the contract end date to avoid appeals board action.

Funds drawn must be expended within 10 working days of receipt. You will not be allowed to draw funds and deposit them into any interest bearing account. Failure to comply with this requirement could result in voiding of your contract.

#### Drawing Funds Through a City or County Administrator

Homeless service providers funded through a contract that is administered through another administrative entity should submit their requests through procedures instituted by that entity.

The administrative entity will be responsible for submitting the required forms to the IFA. The IFA will then issue a check to the entity, who in turn will forward the appropriate funds to the homeless service provider. Homeless service providers under this type of contract should also plan for extra time for the administrator to process the request.

In such cases, all questions concerning the request for funds should be directed through that administrative entity. However, providers may also contact IFA directly if they wish. Resolution of any problems will be worked through the administrator. A good rule is to work directly with your administrator in order to keep problems to a minimum.

#### HMIS Data Certification for ESG/HSOG Draws

In order to make sure that a provider's ServicePoint database is up-to-date, each provider must submit the "HMIS Data Certification for ESG/HSOG Draws" with each request for funds submitted to a city or county or other administrative entity (see Appendix 2 for a sample). This report showing number of clients serviced and entered into ServicePoint should correspond with the number of clients served on the draw of funds report.

# State of Iowa General Accounting Expenditure Form

Requests for ESGP or HSOGP funds must be made with the State of Iowa General Accounting Expenditure form. A blank General Accounting Expenditure form is included in Appendix 2. Instructions for completing this form are as follows:

## Section 1: Identification Information

On the front side of the form, insure the following information has been entered correctly:

- Date - date completing the form
- Accounting Period (mm/yy) - month and year ending date for current expenses being requested
- The grantee (vendor) name and address
- The contract number
- Contract End Date
- A sequential Report Number (i.e. first request = '1'; next request = '2')  
If this is the final draw, please indicate this on the form.
- The date through which funds are being requested (Report Ending)

## Section 2: Budget / Request Information

- **The Budget Column:** The amount budgeted for the grantee for each of the 5 types of activities (Rehabilitation, Essential Services, Operations, Homeless Prevention, and Administration). This information can come from the Attachment B – which is the Budget Summary page from your contract and should already be filled in by IFA.
- **The Request Column:** The amount of funds requested from each type of activity for this report only.
- **Cumulative Total Column:** The amount of funds requested (including this report) for each type of activity thus far (year to date).
- **Total Row:** The totals of the Budget column, the Request column, and the Cumulative Total column.
- **Less Funds Previously Requested:** The amount of funds received by the grantee thus far into the contract.
- **Net Request:** Total Cumulative Requests minus Funds Received. This amount should match the total of the current request column.

## Signature

The person authorized to sign the request for funds must sign the form in the Claimant Certification box (**use BLUE ink**), indicating his or her title and the date the form was signed.

## Request for Payment/Activity Status Report

On the back of the State of Iowa General Accounting Expenditure form is a breakdown of the funding request by provider called *Request for Payment/Activity Status*. IFA will provide partially completed forms for each contract at your request. These forms can also be found on IFA's website. Administrators will need to make copies of these partially completed forms and use one for each request for funds submitted. The following provided additional information about completing this form:

- List each provider and their provider number.
- A pair of lines ("BUDGET" and "SINCE LAST REPORT") should be used for each provider.
- The "BUDGET" line should contain a figure for each type of activity funded through the contract.
- The "SINCE LAST REPORT" line should **contain the amount of funds requested ONLY for this request for funds**. Do not include cumulative totals in this line.
- The total of the column should reflect the totals of each provider's budget totals and actual draw totals.
- The totals of each of the columns across the bottom should equal the current draw amount.
- The total number of new clients served since last report.

If a formal budget amendment has been made to your contract, you must ensure that these adjusted totals are reflected in all of the requests for "BUDGET" information on this form.

## HMIS Data Certification for ESG/HSPG Draws

Providers must submit a completed HMIS Data Certification for ESG/HSPG Draws with each request for funds to the grant administrator. This certification (a sample of which can be found in Appendix 2) must coincide with the reporting period for which the provider is requesting funding. The number of "Total Rows in this Report": will show how many new clients that have been entered into the ServicePoint HMIS during this reporting period. This number of clients should reasonably approximate the number of clients on the Request for Payment/Activity Status Report.

## Delays in Processing

Your request for funds may be delayed for a variety of reasons:

- Math errors
- Insufficient information reported on form
- No certified signature on the form
- Discrepancy between Budget items reported and those on file.

IFA will contact the grantee if there is a problem. Funds will not be issued until the problem has been resolved. If you have a question concerning your request, you should contact Karen Winchester at (515)242-5082 or Lyle Schwery at (515)242-4942.

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# Contract Amendments

## Making Changes to Your Contract

### Overview

During the course of your contract, you may encounter an unforeseen situation that will require your contract to be amended. If so you should initiate, by written request, a contract amendment. Grantees are encouraged to keep these changes to a minimum. You should review the budget information upon receipt of your contract to insure that the distribution of these funds will meet your needs and notify the IFA of any changes you would like to make before the contract is executed.

### Major Amendments

#### Definition

A major amendment process will be initiated if:

- A proposed change would move more than 10 percent of your total contracted funds from one funded activity to another funded activity
- A proposed revision would change the total amount of your contract.

#### The Process

Submit a description of the change, the reason for the change, and the date you would like for the change to be effective. IFA will review the request to determine if the change would result in a major or minor amendment to the contract. If it is a major amendment, IFA will initiate a formal amendment process. This process takes approximately two weeks to complete.

IFA will mail an amendment to you describing the changes that have been made to your contract. It may have to be signed by the mayor, county chairperson, or homeless service provider (depending on the type of contract you have). If this is the case, **return the original of the contract amendment to IFA.** Sign the amendment and mail it back to IFA as soon as possible; a copy will be sent to you. **You cannot expend any funds based upon the proposed change until an executed copy of the amendment is on file with the IFA and the grantee.**

## Minor Amendment

### Definition

A minor amendment is necessary if funds are moved between line items in the budget but the total amount of funding is unchanged.

### Process

Submit to IFA a description of the change, the reason for the change and the date you would like the change effective. IFA will review the request to determine if the change would result in a major or minor amendment to the contract. IFA will notify you (and your administrator, if applicable) in writing if the amendment has been approved or denied.

If a city or county is administering your contract, you should forward the request to them and they will forward it to the IFA.

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# Contract Closeout

## Process for Closing Your Contract with IFA

### Audit Requirements

Soon after your contract expiration, IFA will issue you a “Notice to Close” letter.

The “Notice to Close” letter will instruct you to (1) determine if your contract is subject to an audit, (2) notify IFA of your determination, (3) if liable, select an auditor and notify IFA of your selection, and (4) submit your final reports to IFA.

Contracts may be subject to audit before the closeout of the contract can be completed. The Single Audit Act, as revised in 1996, mandates that the recipients of federal funds expending \$500,000 or more within a year must have these funds audited in accordance with OMB Circular A-133.

### Grant Recipients

- For recipients expending \$500,000 or more in federal funds received from more than one source of federal funding, an organization-wide audit must be performed.

The recipient should identify all Federal awards received and expended and the Federal programs under which they were received. Federal program and award identification shall include, as applicable, the CFDA title and number (#14.231 for ESGP), award number (contract number) and year, name of the Federal agency, and name of the pass-through entity.

- Recipients expending less than \$500,000 in federal funds within a year are exempt from federal audit requirements.
- IFA reserves the right to request additional information as needed.
- Grant funds may be used to pay for a reasonable portion of the agency audit only if the agency qualifies for a federal organization-wide audit (by receiving (\$500,000 or more in federal funding).



# Appendix 1 - Required Contract Documents

- Signature Authorization
- Applicant/Recipient Disclosure Form
- Environmental Documents
- Provider Subagreement
- Vendor ID Form
- Provider Homeless Client Verification
- Iowa HMIS Network Required Minimum Data Set
- Provider ServicePoint Compliance Certification and Instructions
- HMIS User Confidentiality and Responsibility Certification

# AUTHORIZATION TO REQUEST FUNDS HOMELESS ASSISTANCE PROGRAMS

Contract Number: \_\_\_\_\_  
Contractor: \_\_\_\_\_

On behalf of \_\_\_\_\_, the following person(s) will be authorized to submit for review to the Iowa Finance Authority the Form 1 - Status of Funds / Request for Payments.

\_\_\_\_\_  
(please print or type name)

\_\_\_\_\_  
(print or type title)

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

Alternate (optional)

\_\_\_\_\_  
(please print or type name)

\_\_\_\_\_  
(print or type title)

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

This authorization is hereby granted on \_\_\_\_\_ (date). Any change in this authorization will be forwarded in writing to the IFA.

\_\_\_\_\_  
(Mayor or Chair)

# Applicant/Recipient Disclosure/Update Report

U.S. Department of Housing  
and Urban Development

OMB Approval No. 2510-0011 (exp. 12/31/2006)

**Instructions.** (See Public Reporting Statement and Privacy Act Statement and detailed instructions on page 2.)

## Applicant/Recipient Information

Indicate whether this is an Initial Report ☐ or an Update Report ☐

1. Applicant/Recipient Name, Address, and Phone (include area code):  ( ) -	2. Social Security Number or Employer ID Number:  - -
3. HUD Program Name	4. Amount of HUD Assistance Requested/Received
5. State the name and location (street address, City and State) of the project or activity:	

## Part I Threshold Determinations

1. Are you applying for assistance for a specific project or activity? These terms do not include formula grants, such as public housing operating subsidy or CDBG block grants. (For further information see 24 CFR Sec. 4.3). <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Have you received or do you expect to receive assistance within the jurisdiction of the Department (HUD), involving the project or activity in this application, in excess of \$200,000 during this fiscal year (Oct. 1 - Sep. 30)? For further information, see 24 CFR Sec. 4.9 <input type="checkbox"/> Yes <input type="checkbox"/> No.
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If you answered "No" to either question 1 or 2, **Stop!** You do not need to complete the remainder of this form.  
**However,** you must sign the certification at the end of the report.

## Part II Other Government Assistance Provided or Requested / Expected Sources and Use of Funds.

Such assistance includes, but is not limited to, any grant, loan, subsidy, guarantee, insurance, payment, credit, or tax benefit.

Department/State/Local Agency Name and Address	Type of Assistance	Amount Requested/Provided	Expected Uses of the Funds

(Note: Use Additional pages if necessary.)

## Part III Interested Parties.

You must disclose:

- All developers, contractors, or consultants involved in the application for the assistance or in the planning, development, or implementation of the project or activity and
- any other person who has a financial interest in the project or activity for which the assistance is sought that exceeds \$50,000 or 10 percent of the assistance (whichever is lower).

Alphabetical list of all persons with a reportable financial interest in the project or activity (For individuals, give the last name first)	Social Security No. or Employee ID No.	Type of Participation in Project/Activity	Financial Interest in Project/Activity (\$ and %)

(Note: Use Additional pages if necessary.)

## Certification

**Warning:** If you knowingly make a false statement on this form, you may be subject to civil or criminal penalties under Section 1001 of Title 18 of the United States Code. In addition, any person who knowingly and materially violates any required disclosures of information, including intentional non-disclosure, is subject to civil money penalty not to exceed \$10,000 for each violation.

I certify that this information is true and complete.

Signature:  X	Date: (mm/dd/yyyy)
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**Public reporting burden** for this collection of information is estimated to average 2.0 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and a person is not required to respond to, a collection information unless that collection displays a valid OMB control number.

**Privacy Act Statement.** Except for Social Security Numbers (SSNs) and Employer Identification Numbers (EINs), the Department of Housing and Urban Development (HUD) is authorized to collect all the information required by this form under section 102 of the Department of Housing and Urban Development Reform Act of 1989, 42 U.S.C. 3531. Disclosure of SSNs and EINs is optional. The SSN or EIN is used as a unique identifier. The information you provide will enable HUD to carry out its responsibilities under Sections 102(b), (c), and (d) of the Department of Housing and Urban Development Reform Act of 1989, Pub. L. 101-235, approved December 15, 1989. These provisions will help ensure greater accountability and integrity in the provision of certain types of assistance administered by HUD. They will also help ensure that HUD assistance for a specific housing project under Section 102(d) is not more than is necessary to make the project feasible after taking account of other government assistance. HUD will make available to the public all applicant disclosure reports for five years in the case of applications for competitive assistance, and for generally three years in the case of other applications. Update reports will be made available along with the disclosure reports, but in no case for a period generally less than three years. All reports, both initial reports and update reports, will be made available in accordance with the Freedom of Information Act (5 U.S.C. §552) and HUD's implementing regulations at 24 CFR Part 15. HUD will use the information in evaluating individual assistance applications and in performing internal administrative analyses to assist in the management of specific HUD programs. The information will also be used in making the determination under Section 102(d) whether HUD assistance for a specific housing project is more than is necessary to make the project feasible after taking account of other government assistance. You must provide all the required information. Failure to provide any required information may delay the processing of your application, and may result in sanctions and penalties, including imposition of the administrative and civil money penalties specified under 24 CFR §4.38.

**Note:** This form only covers assistance made available by the Department. States and units of general local government that carry out responsibilities under Sections 102(b) and (c) of the Reform Act must develop their own procedures for complying with the Act.

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## Instructions

## Overview.

### A. Coverage. You must complete this report if:

- (1) You are applying for assistance from HUD for a specific project or activity **and** you have received, or expect to receive, assistance from HUD in excess of \$200,000 during the fiscal year;
- (2) You are updating a prior report as discussed below; or
- (3) You are submitting an application for assistance to an entity other than HUD, a State or local government if the application is required by statute or regulation to be submitted to HUD for approval or for any other purpose.

### B. Update reports (filed by "Recipients" of HUD Assistance): General. All recipients of covered assistance must submit update reports to the Department to reflect substantial changes to the initial applicant disclosure reports.

## Line-by-Line Instructions.

### Applicant/Recipient Information.

All applicants for HUD competitive assistance, must complete the information required in blocks 1-5 of form HUD-2880:

1. Enter the full name, address, city, State, zip code, and telephone number (including area code) of the applicant/recipient. Where the applicant/recipient is an individual, the last name, first name, and middle initial must be entered.
2. Entry of the applicant/recipient's SSN or EIN, as appropriate, is optional.
3. Applicants enter the HUD program name under which the assistance is being requested.
4. Applicants enter the amount of HUD assistance that is being requested. Recipients enter the amount of HUD assistance that has been provided and to which the update report relates. The amounts are those stated in the application or award documentation. NOTE: In the case of assistance that is provided pursuant to contract over a period of time (such as project-based assistance under section 8 of the United States Housing Act of 1937), the amount of assistance to be reported includes all amounts that are to be provided over the term of the contract, irrespective of when they are to be received.
5. Applicants enter the name and full address of the project or activity for which the HUD assistance is sought. Recipients enter the name and full address of the HUD-assisted project or activity to which the update report relates. The most appropriate government identifying number must be used (e.g., RFP No.; IFB No.; grant announcement No.; or contract, grant, or loan No.) Include prefixes.

### Part I. Threshold Determinations - Applicants Only

Part I contains information to help the applicant determine whether the remainder of the form must be completed. **Recipients filing Update Reports should not complete this Part.**

If the answer to **either** questions 1 or 2 is No, the applicant need not complete Parts II and III of the report, but must sign the certification at the end of the form.

### Part II. Other Government Assistance and Expected Sources and Uses of Funds.

- A. Other Government Assistance. This Part is to be completed by both applicants and recipients for assistance and recipients filing update reports. Applicants and recipients must report any other government assistance involved in the project or activity for which assistance is sought. Applicants and recipients must report any other government assistance involved in the project or activity. Other government assistance is defined in note 4 on the last page. For purposes of this definition, other government assistance is expected to be made available if, based on an assessment of all the circumstances involved, there are reasonable grounds to anticipate that the assistance will be forthcoming.

Both applicant and recipient disclosures must include all other government assistance involved with the HUD assistance, as well as any other government assistance that was made available before the request, but that has continuing vitality at the time of the request. Examples of this latter category include tax credits that provide for a number of years of tax benefits, and grant assistance that continues to benefit the project at the time of the assistance request.

The following information must be provided:

1. Enter the name and address, city, State, and zip code of the government agency making the assistance available.
  2. State the type of other government assistance (e.g., loan, grant, loan insurance).
  3. Enter the dollar amount of the other government assistance that is, or is expected to be, made available with respect to the project or activities for which the HUD assistance is sought (applicants) or has been provided (recipients).
  4. Uses of funds. Each reportable use of funds must clearly identify the purpose to which they are to be put. Reasonable aggregations may be used, such as "total structure" to include a number of structural costs, such as roof, elevators, exterior masonry, etc.
- B. Non-Government Assistance. Note that the applicant and recipient disclosure report must specify all expected sources and uses of funds - both from HUD **and any other source** - that have been or are to be, made available for the project or activity. Non-government sources of funds typically include (but are not limited to) foundations and private contributors.

### Part III. Interested Parties.

This Part is to be completed by both applicants and recipients filing update reports. Applicants must provide information on:

1. All developers, contractors, or consultants involved in the application for the assistance or in the planning, development, or implementation of the project or activity and
2. any other person who has a financial interest in the project or activity for which the assistance is sought that exceeds \$50,000 or 10 percent of the assistance (whichever is lower).

**Note:** A financial interest means any financial involvement in the project or activity, including (but not limited to) situations in which an individual or entity has an equity interest in the project or activity, shares in any profit on resale or any distribution of surplus cash or other assets of the project or activity, or receives compensation for any goods or services provided in connection with the project or activity. Residency of an individual in housing for which assistance is being sought is not, by itself, considered a covered financial interest.

The information required below must be provided.

1. Enter the full names and addresses. If the person is an entity, the listing must include the full name and address of the entity as well as the CEO. Please list all names alphabetically.
2. Entry of the Social Security Number (SSN) or Employee Identification Number (EIN), as appropriate, for each person listed is optional.
3. Enter the type of participation in the project or activity for each person listed: i.e., the person's specific role in the project (e.g., contractor, consultant, planner, investor).

4. Enter the financial interest in the project or activity for each person listed. The interest must be expressed both as a dollar amount and as a percentage of the amount of the HUD assistance involved.

**Note** that if any of the source/use information required by this report has been provided elsewhere in this application package, the applicant need not repeat the information, but need only refer to the form and location to incorporate it into this report. (It is likely that some of the information required by this report has been provided on SF 424A, and on various budget forms accompanying the application.) If this report requires information beyond that provided elsewhere in the application package, the applicant must include in this report all the additional information required.

Recipients must submit an update report for any change in previously disclosed sources and uses of funds as provided in Section I.D.5., above.

**Notes:**

1. All citations are to 24 CFR Part 4, which was published in the Federal Register. [April 1, 1996, at 63 Fed. Reg. 14448.]
2. Assistance means any contract, grant, loan, cooperative agreement, or other form of assistance, including the insurance or guarantee of a loan or mortgage, that is provided with respect to a specific project or activity under a program administered by the Department. The term does not include contracts, such as procurements contracts, that are subject to the Fed. Acquisition Regulation (FAR) (48 CFR Chapter 1).
3. See 24 CFR §4.9 for detailed guidance on how the threshold is calculated.
4. "Other government assistance" is defined to include any loan, grant, guarantee, insurance, payment, rebate, subsidy, credit, tax benefit, or any other form of direct or indirect assistance from the Federal government (other than that requested from HUD in the application), a State, or a unit of general local government, or any agency or instrumentality thereof, that is, or is expected to be made, available with respect to the project or activities for which the assistance is sought.
5. For the purpose of this form and 24 CFR Part 4, "person" means an individual (including a consultant, lobbyist, or lawyer); corporation; company; association; authority; firm; partnership; society; State, unit of general local government, or other government entity, or agency thereof (including a public housing agency); Indian tribe; and any other organization or group of people.

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# Federal Requirements

## The Major Compliance Areas

This Chapter describes the federal requirements that apply to the ESG Program. Recipients should review this chapter carefully and refer to it as necessary to ensure compliance.

### Environmental Review

The National Environmental Policy Act of 1969 (NEPA) establishes national policies, goals and procedures for protecting, restoring and enhancing environmental quality. CDBG/HOME recipients must comply with this law and with related federal regulations, which are referenced in 24 CFR Part 58. As a recipient you have taken on the responsibility to evaluate how your activity will effect the environment by complying with the requirements set out in 24 CFR Part 58. The requirements are complex, and are only summarized below. For a definitive description of environmental requirements, you may want to consult the regulations, which can be found at <http://www.hud.gov/offices/cpd/energyenviron/environment/index.cfm>

If another federal agency has funds in your activity it will conduct its own environmental review process. You are encouraged to use that agency's review to complete your own record. This will help eliminate the unnecessary duplication of effort. However, before making a finding based on another agency's review, you should ensure the process of determination is adequate to meet responsibilities under 24 CFR Part 58. Although you may concur with the finding and any assessments conducted by another agency, you are still responsible for making sure the contents of your environmental review record (discussed later in this section) are complete. Also, you **must** still fulfill the **publication and comment requirements** outlined in this section.

#### Incurring Costs (24 CFR Part 58.22)

Completion of the environmental review process is mandatory before taking any physical action on a specific site, or making a commitment or expenditure of HUD or any other non-HUD project funds for property acquisition or transfer, rehabilitation, conversion, lease, repair or construction activities. Recipients nor any participant in the development process cannot obligate or incur costs or draw down funds until the environmental review requirements are satisfied and the Department has released funds for the activity. The only things that can be initiated prior to the Department releasing funds are contracting for grant administration, preliminary architectural/engineering fees, and costs associated with the environmental review process. Keep in mind, even these exempt costs can **only** be incurred after the effective date of the contract. No costs incurred or obligated prior to the contract effective date are allowable costs.

#### Project Aggregation (24 CFR Part 58.32)

Recipients must group together and evaluate as a single activity all individual projects that are related either geographically or functionally, or are logical parts of a composite of contemplated actions. When grouping projects, the recipient should be aware that several sites, each requiring some degree of environmental review, actually might be considered one activity (e.g., 40 units being rehabilitated within a target area). The recipient is well served by grouping projects by activity, common locations and functions and activity phasing. Some factors can be considered on an activity-wide basis, while others require site-by-site analysis.

## Incurring Costs (24 CFR Part 58.22)

Recipients can be reimbursed for certain costs prior to the Release of Funds. These costs include:

- Administrative costs
- Design costs, including architectural and engineering
- Costs associated with the new environmental process

These costs must have been incurred after the contract effective date.

For all other activities, recipients cannot incur costs or draw down funds until the environmental review requirements are satisfied and the Department has released funds for the project. **If any construction activities, including the signing of the construction contract, are started before the Release of Funds, it will result in all construction costs becoming ineligible for reimbursement.**

## The Environmental Review Record (24 CFR Part 58.38)

Each activity must have a written record of the environmental review process. This is the “Environmental Review Record” (ERR), which must be available for public review. The ERR must contain a description of the activity and its projects, a map of the activity/project area; documentation of compliance with environmental laws; and other relevant documents, notices or information; and public comments on the recipient’s environmental review. Public comments – and your responses to those comments – are extremely important and must be documented in the ERR.

The ERR will vary in length and content by activity. Some activities are exempt from environmental review, categorically excluded from NEPA, found to have no significant impact on the environment or may require a full environmental impact statement. The steps to comply with NEPA and other applicable laws and regulations are outlined below.

See the appendix to this Chapter for a flow chart of the environmental review process.

## Related Federal Laws and Authorities (24 CFR Part 58.5)

In addition to following NEPA procedures and assessing the impact of the activity on the human environment, recipients must certify that they are in compliance with the following related laws and authorities:

- Historic Preservation
  - The National Historic Preservation Act of 1966, particularly section 106 and 110
  - Executive Order 11593, Protection and Enhancement of the Cultural Environment
  - Federal historic preservation regulations as follows: 36 CFR Part 800
  - The Reservoir Salvage Act of 1960 as amended by the Archeological and Historic Preservation Act of 1974
- Floodplain Management and Wetland Protection
  - Executive Order 11988, Floodplain Management (24 CFR Part 55)
  - Executive Order 11990, Protection of Wetlands (24 CFR Part 55)
- Water Quality: Safe Drinking Water Act (not applicable to Iowa)
  - Coastal Zone Management Act of 1972
- Sole Source Aquifers (not applicable to Iowa)
  - The Safe Drinking Water Act of 1974
  - Sole Source Aquifers



- Endangered Species
  - The Endangered Species Act of 1973 (50 CFR Part 402)
- Wild and Scenic River (not applicable to Iowa)
  - The Wild and Scenic Rivers Act of 1968
- Air Quality
  - The Clean Air Act
  - Determining Conformity of Federal Action to State or Federal Implementation Plans (40 CFR Parts 6, 51 and 93)
- Farmlands Protection
  - Farmland Protection Policy Act of 1981
  - Farmland Protection Policy (7 CFR Part 658)
- Noise
  - Noise Control Act (24 CFR Part 51, Subpart B)
- Environmental Justice Executive Order 12989
- Man-Made Hazards
  - HUD Environmental Standards (24 CFR Part 51, Subpart C & D)

#### Exempt Activities (24 CFR Part 58.34)

Most activities funded by the Department are not exempt from NEPA requirements and other environmental reviews. Exempt projects within your activity may include the following:

- general administration,
- legal and consulting fees,
- financial applications,
- construction loan commitments,
- feasibility studies,
- preliminary architectural and engineering fees, and
- environmental review activities.

If the exemption criteria fit your activity description or projects within your activity, you must do the following:

Document in the ERR the process for making the determination that each activity or project is exempt and meets the conditions specified for such exemption under this section.

If your activity or a project within your activity is exempt, submit the Finding of Exemption/Request for Release of Funds form, signed by the CEO to IFA. A blank form can be found in the Appendix to this chapter. Upon receipt and approval of the form, IFA will release funds.

#### Programmatic Memorandum of Understanding (PMOU)

The IDED in consultation with the Iowa SHPO has determined that certain types of undertakings normally do not “impact” historic properties, and consequently that consultation with the Iowa SHPO for such undertakings is deemed to be unnecessary provided that all of the qualifying criteria are met. Please review the PMOU, which is included in the appendix to this chapter, to see if your activity will fall under the PMOU criteria.

## Categorical Exclusions (24 CFR Part 58.35)

Categorical exclusions are those activities that are not exempt and require no environmental assessment. There are two types of Categorical Exclusions:

Excluded activities that still **MUST** comply with the policies and regulations outlined in the above-mentioned, Related Federal Laws and Authorities are:

- Owner-occupied rehabilitation;
- Homebuyer assistance (down payment or closing costs assistance) for units not already under construction;
- Multi-family rehabilitation (when unit density is not increased more than 20 percent, land use changes are not involved and the estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation);
- Single-family new construction, single-family acquisition and homebuyer rehabilitation assistance (activities involving individual actions on 1- to 4-family dwellings or activities of five or more units on scattered sites more than 2,000 feet apart with not more than four units on any one site or activities where unit density is not increased more than 20 percent, land use changes are not involved and the estimated cost of rehabilitation is less than 75 percent of the total cost of replacement after rehabilitation);
- Acquisition, construction, reconstruction, rehabilitation or installation of public facilities and improvements, only if they are:
  - Used for the same purpose, without change in size, capacity or character;
  - Replacing existing facilities with only a minimal change in use, capacity or location;
  - Consistent with the use of the site and will not change the use, size, capacity or character of the site (e.g., playground equipment in an existing park);
  - Removal of material and architectural barriers which restrict the mobility and accessibility of elderly persons and persons with disabilities;
  - Certain public service activities;
  - Rehabilitation of non-residential structures, including commercial, industrial, and public buildings when the following conditions are met:
    - Unit density is not increased more than 20 percent; the facilities and improvements are in place and will not be changed in size or capacity by more than 20 percent;
    - The activity does not involve changes in land use such as from residential to nonresidential, commercial to industrial, or from one industrial use to another; or
    - Combinations of the above activities.

If your activity is categorically excluded using the above criteria you must do the following:

Document in the ERR the process for making the categorically excluded determination.

**If the activity is located in a floodplain or wetland only:** The *Notice of Proposed Project to be Located in a Floodplain or Wetland* (the notice is included in the appendix to this chapter) must be published at least once in a local newspaper of general circulation. In cities with no newspaper, notices must be displayed in the local post office and its substation and other public places. The recipient must allow the public 15 days for local comment before moving on to the next step.

In order to assure compliance with the Related Federal Laws and Authorities, complete the *Categorically Excluded Projects/Areas of Compliance with Related Laws and Regulations* checklist found in the appendix to this chapter. Recipient must obtain SHPO concurrence on a project before proceeding with step 4 (publishing).

Publish a *Notice of Intent to Request Release of Funds* (NOI/RROF) at least once in a local newspaper of general circulation. In cities where there is no newspaper of general circulation, notices must be displayed in the local post office and its substations. The public must be given at least seven days to comment before moving on to the next step. A blank NOI/RROF is included in the appendix to this Chapter. The recipient must use this form, or its equivalent, to meet federal requirements. If the activity is located in a floodplain or wetland, include the language from the *Notice of Decision of Decision Regarding Project to be Located in the a Floodplain or Wetland* (the notice is included in the appendix to this chapter) in the NOI/RROF notice.

After the local seven-day comment period has elapsed, submit the *Request for Release of Funds and Certification* form to IFA along with the proof of publication (for HOME recipients that are for-profit and not-for-profit, you need to forward HUD Form 7015.15, which is included in the appendix to this chapter). A blank form is included in the appendix to this chapter. Upon receipt of the form, IFA will allow 15 days for public comment. IFA will consider only comments pertaining to those matters listed under 24 CFR Part 58.75(6). (For HOME recipients that are for-profit or not-for-profit, IFA will submit HUD Form 7015.15 RROF and certification along with proof of publication to HUD for their 15 day comment period.)

After IFA releases funds, the recipient may draw funds after other contract conditions and requirements have been met.

- The excluded activities that are **NOT** subject to the above listed Related Federal Laws and Authorities for the purposes of this management guide include the following:
- Tenant-based rental assistance;
- Activities to assist homebuyers to purchase existing dwelling units or dwelling units under construction, including closing costs and down payment assistance. WARNING: homebuyer assistance for units not already under construction must be treated as a categorical exclusion requiring compliance with Related Federal Laws and Authorities listed above.
- Housing pre-development costs.
- If these criteria describe your activity you must do the following:
- Document in the ERR the process for making the determination.

Submit the Finding of Categorical Exclusion: Not subject to the Related Federal Laws and Authorities/Request for Release of Funds form. A blank form can be found in the appendix to this chapter. No public comment periods are necessary for this type of categorically excluded project. Upon receipt and approval of the form, IIFA will release funds.

After IDED releases funds, the recipient may draw down funds after applicable contract conditions have been satisfied.

## Environmental Assessment (24 CFR Part 58.36)

If the activity is neither exempt nor categorically excluded, you must prepare an Environmental Assessment (EA). The *Environmental Clearance Worksheet* is included in the appendix to this Chapter for this purpose. When properly completed, this form serves as the EA and complies with the environmental requirements in 24 CFR Part 58.40. Recipients must obtain SHPO concurrence on a project before proceeding with Step 1 (publishing).

**If the activity is located in a floodplain or wetland only:** The *Notice of Proposed Project to be Located in a Floodplain or Wetland* (the notice is included in the appendix to this chapter) must be published at least once in a local newspaper of general circulation. In cities with no newspaper, notices must be displayed in the local post office and its substation and other public places. The recipient must allow the public 15 additional days for local comment.

If the EA indicates an activity may significantly affect the environment and requires an Environmental Impact Statement, contact IDED for assistance.

If the EA indicates the activity will have no significant effect on the quality of the human environment, the recipient must do the following:

Publish the Concurrent Notice to Public of a Finding of No Significant Impact (FONSI) and Request for Release of Funds (RROF) Notice (the form is included in the appendix to this Chapter) at least once in a local newspaper of general circulation. In cities with no newspaper of general circulation, notices must be displayed in the local post office and its substations and other public places. The recipient must allow the public 15 days for local (state) comment (18 days for posting) before moving on to step 2. The notice must clearly indicate that it is intended to meet two separate procedural requirements and request that comments be specific as to which they address. If the activity is located in a floodplain or wetland, include language from the *Notice of Decision Regarding Project to be Located in a Floodplain or Wetland* (the notice is included in the appendix to this chapter) in the FONSI/RROF notice.

The FONSI/RROF notice must also be sent to individuals, groups, and agencies known to be interested in the activity. A list of agencies to which notices should be sent can be found in the appendix to this chapter.

After the local (state) comment period has elapsed, you must submit a Request for Release of Funds and Certification (a form is included in the appendix to this Chapter) to IFA along with the proof of publication (for HOME recipients that are for-profit and not-for-profit, you need to forward HUD Form 7015.15, which is included in the appendix to this chapter). Upon receipt of the RROF, IFA will allow another 15 days for public comment. IFA will consider only comments pertaining to those matters listed under 24 CFR Part 58.75. (For HOME recipients that are for-profit or not-for-profit, IFA will submit HUD Form 7015.15 RROF and certification along with proof of publication to HUD for their 15 day comment period.)

If an amendment to the activity is proposed, the recipient must reevaluate its EA findings of no significant impact. An amendment may include new circumstances and/or environmental conditions arising during implementation or if an alternative not considered in the original EA is selected. The reevaluation determines if the FONSI is still valid. If it is, but data or conditions have changed, the recipient must amend the original EA and update the ERR.

If the activity site changes, a new EA must be completed for the new site. The recipient must follow steps 1 – 3 above to ensure compliance with 24 CFR Part 58.

After IFA releases funds, the recipient may draw funds after applicable contract conditions have been satisfied.

Following is a **sample** timetable for the FONSI/RROF process

- Day 1: FONSI/RROF notice printed in newspaper
- Day 2: first day of 15-day Local (state) comment period
- Day 16: last day of 15-day Local (state) comment period
- Day 17: RROF and Certification, proof of publication and HUD Form 7015.15 are sent to IFA
- Day 20: State receives request; first day of State (HUD) comment period
- Day 35: last day of 15-day State (HUD) comment period
- Day 36: State (HUD) approves RROF and Certification

Through the RROF the CDBG recipient accepts the role of responsible federal agency should there be a lawsuit concerning environmental laws and regulations. The CEO assumes responsibility for the jurisdiction when he/she signs the Request for Release of Funds and Certification.

Recipients must make certain that related environmental laws and regulations are satisfied before funds are committed toward the project or activity.

# ESGP Environmental Process

Determine if the project is exempt, categorically excluded or requires environmental assessment

**Exempt**  
(24 CFR Part 58.34)

Document the reason the project is exempt in the ERR

**Send Form**

Finding of Exemption/  
Request For Release of  
Funds

Date: \_\_\_\_\_

**Funds Released**

Date: \_\_\_\_\_

**Categorically Excluded**  
(24 CFR Part 58.35)

If **Not** subject to Related laws  
and Authorities

Document the reason the  
project is categorically  
excluded in the ERR

**Send Form**

Finding of Categorical Exclusion  
Not Subject to Related Laws &  
Authorities/ Request for Release  
of Funds  
Date: \_\_\_\_\_

**Funds Released**

Date: \_\_\_\_\_

**If subject to Related Laws  
and Authorities**

**Checklist**

Categorically Excluded Projects

SHPO (if required) and  
Tribal Concurrence

Date: \_\_\_\_\_

Recipient must receive concurrence  
from SHPO (if required) before  
publishing RROF.

**Publish**

*Notice of Intent to Request Release  
of Funds (RROF)*

**Local 7 day comment period**

Start Date: \_\_\_\_\_

End Date: \_\_\_\_\_

**Send Form**

*RROF/Certification to DED  
with Proof of Publication.*

Date: \_\_\_\_\_

**State 15 day comment period**

Start Date: \_\_\_\_\_

End Date: \_\_\_\_\_

**Funds Released**

Date: \_\_\_\_\_

**Environmental Assessment**  
(24 CFR Part 58.36)

**Checklist**

*Environmental Clearance  
Worksheet*

SHPO (if required) and  
Tribal Concurrence

Date: \_\_\_\_\_

Recipient must receive  
concurrence from SHPO (if  
required) before publishing  
FONSI/RROF.

**If no environmental impact  
Publish**

*No Significant Impact (FONSI)  
and Intent to Request Release of  
Funds (RROF)*

**Local 15 day comment period**

Start Date: \_\_\_\_\_

End Date: \_\_\_\_\_

**Send Form**

*RROF/Certification to DED with  
Proof of Publication*

Date: \_\_\_\_\_

**State 15 day comment period**

Start Date: \_\_\_\_\_

End Date: \_\_\_\_\_

**Funds Released**

Date: \_\_\_\_\_

\* If project is not  
exempt, contact  
Rita Eble at IDIED.

ESGP ENVIRONMENTAL REVIEW  
**FINDING OF EXEMPTION**  
**REQUEST FOR RELEASE OF FUNDS FORM**

Recipient:\_\_\_\_\_ \_Contract Number:\_\_\_\_\_

A finding of exemption has been made for the following approved project:

***(provide title and description of project)***

This finding is based on the following:

***(see instructions for list of exempt projects)***

An Environmental Review Record (ERR) supporting the above finding has been prepared and is available for IDED review and public inspection at the address of the recipient.

As the duly designated certifying official of the recipient, I certify that: I am authorized to and do consent to assume the status of responsible federal official under the National Environmental Policy Act of 1969 and each provision of law designated in the 24 CFR Part 58.5 list of NEPA-related authorities insofar as the provision of these laws apply to the HUD responsibilities for environmental review, decision-making and actions that have been assumed by the grantee. I am authorized to and do accept, on behalf of the recipient and personally, the jurisdiction of the federal courts for the enforcement of all these responsibilities, in my capacity as certifying officer of the recipient.

\_\_\_\_\_  
Signature of Recipient Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Typed/Printed Name and Title

## HOUSING PROGRAM ENVIRONMENTAL REVIEW

**FINDING OF CATEGORICAL EXCLUSION:  
NOT SUBJECT TO RELATED FEDERAL LAWS AND AUTHORITIES  
REQUEST FOR RELEASE OF FUNDS FORM**

Recipient: \_\_\_\_\_ Contract Number: \_\_\_\_\_

A finding of categorical exclusion has been made for the following approved project:

***(provide title and description of project)***

This finding is based on the following:

***(see instructions for list of categorically excluded projects that are not subject to related Federal laws and Authorities)***

An Environmental Review Record (ERR) supporting the above finding has been prepared and is available for IDED review and public inspection at the address of the recipient.

As the duly designated certifying official of the recipient, I certify that: I am authorized to and do consent to assume the status of responsible federal official under the National Environmental Policy Act of 1969 and each provision of law designated in the 24 CFR Part 58.5 list of NEPA-related authorities insofar as the provision of these laws apply to the HUD responsibilities for environmental review, decision-making and actions that have been assumed by the grantee. I am authorized to and do accept, on behalf of the recipient and personally, the jurisdiction of the federal courts for the enforcement of all these responsibilities, in my capacity as certifying officer of the recipient.

\_\_\_\_\_  
Signature of Recipient Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
*Typed/Printed Name and Title*

## Compliance Documentation Checklist 24 CFR 58.6

Complete this checklist for all projects that are not Categorically Excluded Subject to the Statutes per 58.35 or are not completing an environmental assessment. If you meet the previously mentioned categories you will assess the effects of the requirements of 24 CFR 59.6 in other environmental reviews.

Recipient Name: \_\_\_\_\_ Contract Number: \_\_\_\_\_

For information on this request, contact:

\_\_\_\_\_  
Contact Name Contact Phone Number

### Level of Environmental Review Determination: (check one)

Exempt per 24 CFR 58.34

Categorically Excluded Not Subject to Statutes per 58.35 (b)

You must include this form and pertinent documentation in your Environment Review Record (ERR).

### Runway Clear Zones:

Does the project involve assistance, subsidy, or insurance for construction, land purchase or sale, and development; does any of the following exist within one mile of the project area:

#### Designated primary/commercial airports in Iowa:

	Primary Airport
Burlington	Burlington Regional
edar Rapids	The Eastern Iowa International
es Moines	Des Moines International
ubuque	Dubuque Regional
ort Dodge	Fort Dodge Regional
ason City	Mason City Municipal
ious City	Sioux Gateway
Waterloo	Waterloo Municipal

#### 2. Other Commercial Service Airports:

Carroll	Arthur N. Neu
Ottumwa	Ottumwa Industrial
Sheldon	Sheldon Municipal
Sioux Center	Sioux Center Municipal
Spencer	Spencer Municipal

#### 3. Military Airfields

Yes:

Contact the airport and acquire a copy of the Runway Clear Zone map (a.k.a. runway protection zone) from a non-military airfield or a Clear Zone map from a military airfield. It is HUD Policy not to provide assistance for projects located in these zones if they will be occupied frequently by people:

If the project property is within this zone and not occupied frequently by people, the buyer must sign a document acknowledging they received the following information about the property:

If an aircraft accident were to occur it is more likely to occur within the zone than other areas around the airport.

The airport operator may wish to purchase the property at some point in the future as part of a clear zone acquisition program. Keep all documentation in the ERR.

If the project property is not within this zone: document this in the ERR, compliance is achieved.

**Flood Disaster Protection Act of 1973:** (42 U.S.C. 40001-4128): Not applicable because the responsible entity is receiving money as part of a formula grant made to a state.

**National Flood Insurance Reform Act of 1994:** (42 U.S.C. 5154(a)): Certify that assistance in a special flood hazard area as determined by FEMA will not be used to make a payment to a person for repair, replacement or restoration from flood damage to any personal, residential, replacement or commercial property if the person has previously received federal flood disaster assistance and the person failed to obtain and maintain flood insurance.

**Coastal Barrier Resource Act** (16 U.S.C. 3501): Not applicable because Iowa is not part of the Coastal Barrier Resource system.



# Homeless Assistance Grant Subagreement

This agreement provides terms and conditions between \_\_\_\_\_ (hereinafter referred to as the Grantee) and \_\_\_\_\_ (hereinafter referred to as Provider) for the provision of related services and assistance to Grantee's Emergency Shelter Grants Program (ESGP) or Homeless Shelter Operations Grant Program (HSOG) contract number \_\_\_\_\_ with the State of Iowa Finance Authority (IFA).

1. The Grantee shall make available to the Provider the sum of \$ \_\_\_\_\_ in accordance with the terms and conditions of this Contract, the Grant Contract Agreement between the State of Iowa and the Grantee. Attached hereto as Exhibit 1, and in accordance to any subsequent provisions, requirements, and assurances promulgated by the State of Iowa that apply to said grant. Said subsequent requirements shall be specifically incorporated herein. Failure to adhere to the above mentioned requirements, provisions, and assurances shall cause this Agreement to be terminated at the discretion of the Grantee or State. It is agreed between the parties that this agreement, with attachments, as written, is the full and complete agreement between the parties.
2. The Grantee shall be obligated to provide said grant funds to Provider only on the condition that said funds shall be available from the State of Iowa. Failure of the Grantee to receive grant funds from the State shall cause this agreement to be terminated.
3. The Provider, its officers, agents, and employees agree to hold the Grantee and the State of Iowa harmless from any and all liability, claims, damages, and litigation arising from or under the terms of this agreement.
4. This agreement shall be binding upon the Grantee and the Provider, and neither shall assign or transfer its rights and responsibilities without prior written consent of the other. However, the Grantee shall not transfer any ultimate fiscal responsibilities including: authority to request funds, authorization of activity status reports, or final audit.
5. This agreement shall be governed by the laws of the State of Iowa. In the event any provision of this agreement shall be held invalid or unenforceable by any court of competent jurisdiction, such holding shall not invalidate or render unenforceable any other provision hereof.
6. The terms and conditions of this Agreement may only be amended or supplemented by written agreement of both parties and, when necessary, with State concurrence. Such amendments include any deviation from the Attachment B of the Grantee-IFA contract.
7. The Grantee shall be responsible for and adhere to the following. Non-compliance may be grounds for Grantee canceling, terminating, or suspending this contract. The Provider shall also comply with the following in conducting its activities.
  - a. The requirements of Title VIII of the Civil Rights Act of 1968 (42 U. S. C. 3601-19) and implementing regulations; Executive Order 11063 and implementing regulations at 24 CFR Part 107; and Title VI of the Civil Rights Act of 1964 (42 U.S.C. 20002d-I )and implementing regulations issued at 24 CFR Part 1.
  - b. The provision against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) and the prohibition against discrimination against handicapped individuals under Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794).
  - c. The requirements of Executive Order 11246 and regulation under the Order at 41 CFR Chapter 60.
  - d. The requirements of Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u).
  - e. The requirements of Executive Orders 11625, 12432, and 12138. Consistent with responsibilities under these Orders, the Provider must make efforts to encourage the use of the minority and women's business enterprises in connection with activities funded under this part.
  - f. The requirements of the Anti-Drug Abuse Act of 1988 (P. L. 100-690). The Provider will administer in good faith, policies designed to ensure that the assisted homeless facility is free from illegal use, possession, or distribution of drugs or alcohol by its beneficiaries.
  - g. Compliance with OMB Circular A-133 and its implementing regulations.

h. Prohibited use of disbarred, suspended, or ineligible contractors under 24 CFR Part 24.

8. The provider shall provide uncontested access to contract related records by any appropriate federal or state agents, and the Grantee, and retain said records for no less than three (3) years after the Iowa Finance Authority's close-out acceptance. This includes any financial, procurement, and local match records required for the Grantee's closeout and audit.
9. The Provider shall provide to the Grantee all necessary records, data, information, and documentation required for the Grantee to carry out its obligations under the Grant Agreement.
10. The Provider shall provide its Local Match (ESGP Contracts only) funds or activity as required under the Grant Agreement and its previous commitment to the Grantee.
11. This contract shall terminate on the End Date of the Iowa Finance Authority's contract unless otherwise modified in writing herein.

This contract shall be effective upon signature of all parties.

\_\_\_\_\_  
Homeless Provider Chairperson Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
City/County Mayor/Co. Chairperson Signature

\_\_\_\_\_  
Date

(Please print or type except for signature)

BOX A	BOX B
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<p><b>Are you/your business:</b>                      <u>YES</u>      <u>NO</u></p> <p style="padding-left: 100px;"><b>Individual</b>              <b>[I]</b>      _____</p> <p>Or      <b>Sole Proprietorship</b>      <b>[S]</b>      _____</p> <p>If the answer to both was no, please complete Box B</p> <p>If you answered <b>yes</b> to either item, please provide your</p> <p><b>Social Security number:</b></p> <p style="text-align: center;"> <span style="border: 1px solid black; display: inline-block; width: 20px; height: 20px;"></span> <span style="border: 1px solid black; display: inline-block; width: 20px; height: 20px;"></span> <span style="border: 1px solid black; display: inline-block; width: 20px; height: 20px;"></span> <span style="border: 1px solid black; display: inline-block; width: 20px; height: 20px;"></span> <span style="border: 1px solid black; display: inline-block; width: 20px; height: 20px;"></span> <span style="border: 1px solid black; display: inline-block; width: 20px; height: 20px;"></span> <span style="border: 1px solid black; display: inline-block; width: 20px; height: 20px;"></span> <span style="border: 1px solid black; display: inline-block; width: 20px; height: 20px;"></span> </p> <p style="text-align: center;"><b>AND</b></p> <p>Complete the Name and Address below:</p> <p>Last Name:</p> <p style="border-bottom: 1px solid black; height: 20px; width: 100%;"></p> <p>First Name</p> <p style="border-bottom: 1px solid black; height: 20px; width: 100%;"></p> <p style="text-align: right;">MI <span style="border-bottom: 1px solid black; height: 20px; width: 20px;"></span></p> <p>Doing Business As:</p> <p style="border-bottom: 1px solid black; height: 20px; width: 100%;"></p> <p>Address:</p> <p style="border-bottom: 1px solid black; height: 20px; width: 100%;"></p> <p>Address:</p> <p style="border-bottom: 1px solid black; height: 20px; width: 100%;"></p> <p>City:</p> <p style="border-bottom: 1px solid black; height: 20px; width: 100%;"></p> <p>State:                                      Zip:</p> <p style="display: flex; justify-content: space-between;"> <span style="border-bottom: 1px solid black; height: 20px; width: 20%;"></span> <span style="border-bottom: 1px solid black; height: 20px; width: 40%;"></span> </p>	<p>Is your business:                                      <u>YES</u>      <u>NO</u></p> <p><b>Corporation</b>                                      <b>[C]</b>      _____</p> <p><b>Partnership</b>                                      <b>[P]</b>      _____</p> <p><b>Estate or Trust</b>                                      <b>[E]</b>      _____</p> <p><b>Public Service Corp</b>                                      <b>[U]</b>      _____</p> <p><b>Government</b>                                      <b>[G]</b>      _____</p> <p><b>Other</b>                                      <b>[O]</b>      _____</p> <p><b>Please explain</b> _____</p> <p>Please provide us with your <b>Federal Employer Identification Number</b></p> <p style="text-align: center;"> <span style="border: 1px solid black; display: inline-block; width: 20px; height: 20px;"></span> <span style="border: 1px solid black; display: inline-block; width: 20px; height: 20px;"></span> <span style="border: 1px solid black; display: inline-block; width: 20px; height: 20px;"></span> <span style="border: 1px solid black; display: inline-block; width: 20px; height: 20px;"></span> <span style="border: 1px solid black; display: inline-block; width: 20px; height: 20px;"></span> <span style="border: 1px solid black; display: inline-block; width: 20px; height: 20px;"></span> <span style="border: 1px solid black; display: inline-block; width: 20px; height: 20px;"></span> <span style="border: 1px solid black; display: inline-block; width: 20px; height: 20px;"></span> </p> <p style="text-align: center;"><b>AND</b></p> <p>Complete the Name and Address below:</p> <p>Firm:</p> <p style="border-bottom: 1px solid black; height: 20px; width: 100%;"></p> <p>Doing Business As:</p> <p style="border-bottom: 1px solid black; height: 20px; width: 100%;"></p> <p>Address:</p> <p style="border-bottom: 1px solid black; height: 20px; width: 100%;"></p> <p>Address:</p> <p style="border-bottom: 1px solid black; height: 20px; width: 100%;"></p> <p>Address:</p> <p style="border-bottom: 1px solid black; height: 20px; width: 100%;"></p> <p>City:</p> <p style="border-bottom: 1px solid black; height: 20px; width: 100%;"></p> <p>State:                                      Zip:</p> <p style="display: flex; justify-content: space-between;"> <span style="border-bottom: 1px solid black; height: 20px; width: 20%;"></span> <span style="border-bottom: 1px solid black; height: 20px; width: 40%;"></span> </p>
--	---

**Certification**—Under penalties of perjury, I certify that:

(1) The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me), and

(2) I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**FOR OFFICE USE ONLY (Refer to Procedure 270.450 for more details)**

From: Dept. <hr/> Contact <hr/> Added For Purchasing ____ Yes ____ No	____ Add ____ Change  ____ Delete Reason _____
--	--

**Emergency Shelter Grants Program (ESGP)**  
**Homeless Client Verification Form**

(For use in client files in documentation of homelessness)

Date: \_\_\_\_\_

To: \_\_\_\_\_

From: \_\_\_\_\_

RE: \_\_\_\_\_

The above individual has applied for homeless assistance through \_\_\_\_\_. As required by the Department of Housing and Urban Development, this individual meets the definition of homeless due to the following reason(s). All required documentation is attached.

\_\_\_\_\_ Is currently living in places not intended for human habitation (i.e., street).

**Documentation needed:** Letter from referring sources stating the client has been living on the street or other place not intended for human habitation.

\_\_\_\_\_ Is currently living in a shelter/mission.

**Documentation needed:** Letter from the shelter verifying the stay, including dates of stay.

\_\_\_\_\_ Is currently living in a transitional housing (TH) program.

**Documentation needed:** Letter from TH program stating that the individual has been a resident of the TH program and the applicant's homeless status prior to entering the TH program.

\_\_\_\_\_ Is being evicted from a private dwelling.

**Documentation needed:** Formal eviction notice, or letter from a family/friend signed and dated stating that the individual may no longer stay at the residence; documentation of income of the applicant; documentation indicating what efforts were made to obtain alternative housing and why, without the homeless assistance, the person would be living on the street or in a shelter.

\_\_\_\_\_ Is being discharged from a short-term stay in an institution (less than 31 days).

**Documentation needed:** Written verification from the institution that the participant has been residing in the institution less than 31 days; and verification that prior to the stay, the person met one of the criteria listed above with the appropriate documentation indicated.

\_\_\_\_\_ Is being discharged from a long-term stay in an institution.

**Documentation needed:** Written verification from the institution that the participant is being discharged within the week (7 days) before receiving homeless assistance; and documentation of the following:

- 1) applicant income
- 2) what efforts were made to obtain alternative housing, and
- 3) why, without assistance, the applicant would be living on the street or in a shelter.

\_\_\_\_\_ Is fleeing a domestic violence situation.

**Documentation needed:** Written verification, signed and dated, from the applicant that he/she is fleeing a domestic violence situation.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Emergency Shelter Grants Program (ESGP)

## Homeless Service Provider Homeless Client Verification

**Contract Number:** \_\_\_\_\_

**Grantee:** \_\_\_\_\_

**Provider:** \_\_\_\_\_

As the highest designated authority for this organization, I affirm that all activities funded through the Emergency Shelter Grants Program (ESGP) have been used to support eligible activities as outlined in my contract with \_\_\_\_\_ and that these funds will be primarily used to meet the needs of homeless and/or near homeless clients.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Provider Name

\_\_\_\_\_  
Date

Emergency Shelter Grants Program (ESGP)

**IOWA HOMELESS INFORMATION MANAGEMENT NETWORK**  
*Minimum Required Data Set*

**Provider # & Name:** \_\_\_\_\_

DATA COLLECTION POLICY

Provider Agencies must attempt to collect a minimum data set from each client served by the program that is supported by the Iowa Finance Authority's Homeless Assistance Funds, either the Emergency Shelter Grant Program (ESGP) or the Homeless Shelter Operations Grant Program (HSOGP).

Provider Agencies shall at all times have rights to the data pertaining to their clients that was created or entered by them in the ServicePoint™ system. Provider Agencies shall be bound by all restrictions imposed by clients pertaining to the use of personal data that they do not formally release.

**It is a Client's decision about which information, if any, entered into the ServicePoint system shall be shared and with any other Provider Agencies.** The ServicePoint™ Client Informed Consent/Release of Information shall be signed if the Client agrees to share information with Provider Agencies.

Minimum data entry on each consenting Client will be:

*(For DV Clients: Client Full Name and Social Security Number not required.)*

- Client Full Name
- Client Social Security Number
- Client Birth date
- Client Gender
- Client Race/Ethnicity
- All questions included in the "Iowa Assessment" section of ServicePoint™.
- Complete exit information for each client.

I understand and agree to comply with all the statements listed above.

\_\_\_\_\_  
ServicePoint User Signature Date

\_\_\_\_\_  
Agency/System Administrator Date

\_\_\_\_\_  
Agency Executive Director Date

# IOWA HOMELESS INFORMATION MANAGEMENT NETWORK

## USER CONFIDENTIALITY AND RESPONSIBILITY CERTIFICATION

Provider # & Name: \_\_\_\_\_

### USER RESPONSIBILITY

**Your User ID and Password give you access to the statewide ServicePoint™ system.** Initial each item below to indicate your understanding and acceptance of the proper use of your User ID and password. **Failure to uphold the confidentiality and security standards set forth below is grounds for immediate termination from the Iowa Homeless Information Management System and forfeiture of grant funds if applicable.**

- \_\_\_\_\_ My User ID and Password are for my use only and must not be shared with anyone.
- \_\_\_\_\_ I must take all reasonable means to keep my Password physically secure.
- \_\_\_\_\_ I understand that the only individuals who can view information in the ServicePoint system are authorized users and the Clients to whom the information pertains.
- \_\_\_\_\_ I may only view, obtain, disclose, or use the database information that is necessary to perform my job.
- \_\_\_\_\_ If I am logged into ServicePoint and must leave the work area where the computer is located, I **must log-off** of ServicePoint before leaving the work area.
- \_\_\_\_\_ A computer that has ServicePoint “open and running” shall never be left unattended.
- \_\_\_\_\_ Failure to log off ServicePoint appropriately may result in a breach in client confidentiality and system security.
- \_\_\_\_\_ Hard copies of Iowa ServicePoint information must be kept in a secure file.
- \_\_\_\_\_ When hard copies of Iowa ServicePoint information are no longer needed, they must be properly destroyed to maintain confidentiality.
- \_\_\_\_\_ If I notice or suspect a security breach, I must immediately notify the System Administrator - Iowa Institute for Community Alliances (IICA).

I understand and agree to comply with all the statements listed above.

\_\_\_\_\_  
ServicePoint User Signature Date

\_\_\_\_\_  
Agency/System Administrator Date

\_\_\_\_\_  
Agency Executive Director Date

**NOTE:** The Agency Administrator and Executive Director must sign all User Policy forms for the agency's ServicePoint Users. Staff at IICA will sign the User Policy forms for Agency Administrators.

# Provider ServicePoint Compliance Certification 06-07

Provider # & Name: \_\_\_\_\_

Complete this form, and include it with your contract documents.

Total rows number from "Provider Entry Compliance 06-07": \_\_\_\_\_

By signing below, I certify that the number recorded above represents the correct number of clients entering this agency's program(s) between 1/1/2006 and 4/30/2006.

\_\_\_\_\_  
Name

\_\_\_\_\_  
Date

**and**

Total rows number from "Provider Open Record Compliance 06-07": \_\_\_\_\_

By signing below, I certify that the number recorded above represents only current clients.

\_\_\_\_\_  
Name

\_\_\_\_\_  
Date

**Remember: You must attach the Provider Entry and the Provider Open Record Compliance 06-07 reports to this certification which can be found in the Reportwriter function of ServicePoint!**



# HMIS Compliance Certification for 2006-2007 Fiscal Year

Along with your contract documents, your agency must include a certification that the numbers in ServicePoint correctly reflect the number of new clients served from January through April 2006, and that your data entry is current.

This information is very important and will allow the state of Iowa to report accurate information to HUD's first Annual Homeless Assessment Report. **There are three steps to complete the certification.**

## **Step 1: Run and print the "Provider Entry Compliance 06-07" report.**

1. Log in to ServicePoint
2. Click on the green "Reports" tab at the top of the screen.
3. Click on "ReportWriter" at the bottom left of the screen. A new window will open.
4. In the new window, click on the green "Options" tab at the top of the window. An alphabetical list of saved reports will display. The report names are in the left column.
5. Scroll down through the list until you see the name "Provider Entry Compliance 06-07." Use your mouse to point to the report name (when you are pointing at the name, the name will display an underline).
6. Single click on the report name.
7. A pop-up message will display with the following message: "By loading a Quick Query you will over-write any unsaved changes. Are you sure you want to continue?"
8. Click OK
9. Click on the green "**Counting**" tab at the top of the window. The report may take several minutes to run.
10. When the report displays, point the mouse anywhere in the middle of the report and single-click the right button on the mouse. A small menu will pop up. To print the report, click "Print" on the pop-up menu.
11. **Write the words "Entry Report" on the printout.** At this time, the reporting tool does not display the name of the report you have just printed, so it must be hand written. **Include this report printout with your contract documents.**

(Note: To view the client-level detail for this report, click "Preview" in step 9, but do not send this client-level data with your contract.)

## **Step 2: Run and print the "Provider Open Record Compliance 06-07" report.**

1. Log in to ServicePoint
2. Click on the green "Reports" tab at the top of the screen.
3. Click on "ReportWriter" at the bottom left of the screen. A new window will open.
4. In the new window, click on the green "Options" tab at the top of the window. An alphabetical list of saved reports will display. The report names are in the left column.
5. Scroll down through the list until you see the name "Provider Open Record Compliance 06-07." Use your mouse to point to the report name (when you are pointing at the name, the name will display an underline).
6. Single click on the report name.
7. A pop-up message will display with the following message: "By loading a Quick Query you will over-write any unsaved changes. Are you sure you want to continue?"
8. Click OK
9. Click on the green "**Counting**" tab at the top of the window. The report may take several minutes to run.
10. When the report displays, point the mouse anywhere in the middle of the report and single-click the right button on the mouse. A small menu will pop up. To print the report, click "Print" on the pop-up menu.
11. **Write the words "Open Record Report" on the printout.** At this time, the reporting tool does not display the name of the report you have just printed, so it must be hand written. **Include this report printout with your contract documents.**

(Note: To view the client-level detail for this report, click "Preview" in step 9, but do not send this client-level data with your contract.)

## **Step 3: Fill out the "Provider ServicePoint Compliance Certification 06-07" form found in this document, and include it with your contract documents.**

## Appendix 2 - Request for Funds Forms

- General Accounting Expenditure Form (GAX) -one for ESGP and one for HSOG
- Request for Payment/Activity Status Form - one for ESGP and one for HSOG
- Sample Documents
- HMIS Certification for ESGP/HSOG Draws

BUDGET FY	<b>GENERAL ACCOUNTING EXPENDITURE</b>				DOCUMENT NUMBER
	DATE	ACCTG PERIOD (mm/yy)			
VENDOR CODE			AGENCY NAME		
VENDOR NAME AND ADDRESS			BILL TO ADDRESS (ORDERING AGENCY) Department of Economic Development Bureau of Community Facilities & Services 200 East Grand Avenue Des Moines, IA 50309		SHIP TO ADDRESS
TERMS	FOB	ORDER APPROVED BY			GOODS RECEIVED/SERVICES PERFORMED DATE INITIALS
QUANTITY	VENDOR'S INVOICE DATE	VENDOR'S INVOICE NUMBER			
Contract Number:		Contract End Date:		Report Number:	Report Ending:

## Emergency Shelter Grant Program (ESGP)

ACTIVITY Code / Title	ESGP Budget	Current Request	Total to Date
Rehabilitation	\$	\$	\$
Essential Services	\$	\$	\$
Operations	\$	\$	\$
Homeless Prevention	\$	\$	\$
Administration	\$	\$	\$
<b>TOTALS</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>
Less Funds Previously Requested			\$
<b>NET REQUEST</b>			<b>\$</b>

<b>CLAIMANT'S CERTIFICATION</b> I CERTIFY THAT THE ITEMS FOR WHICH PAYMENT IS CLAIMED WERE FURNISHED FOR STATE BUSINESS UNDER THE AUTHORITY OF THE LAW AND THAT THE CHARGES ARE REASONABLE, PROPER, AND CORRECT, AND NO PART OF THIS CLAIM HAS BEEN PAID. DATE 10/20/05 TITLE Acct. II										<b>AGENCY CERTIFICATION</b> I CERTIFY THAT THE ABOVE EXPENSES WERE INCURRED AND THE AMOUNTS ARE CORRECT AND SHOULD BE PAID FROM THE FUNDS APPROPRIATED BY: CODE OR CHAPTER SECTION(S)												
CLAIMANT'S SIGNATURE										AUTHORIZED SIGNATURE												
THE FOLLOWING FIELDS ARE FOR STATE ACCOUNTING USE ONLY																						
DOC TYPE GAX		DOC NUMBER			DOC DATE		ACCTG PRD		BUDGET FY		ACTION NEW/MOD E		PO SHIP INSTR		GAX TYPE 1		INT IND		INT SELLER FUND		INT SELLER AGCY	
VENDOR CODE			ADDR OVERRIDE		F/A INDICATOR		EFT IND		TEXT -po's only (y/N)			TEXT (po's only)										
REF DOC TYPE		REF DOC NUMBER			REF DOC LINE		COM LN		VEND INVOICE #				COMMODITY CODE				GS CONTRACT					
LINE	FUND	AGCY	ORG	SUB ORG	ACTV	FUNC	OBJT	SUB OBJT	JOB NUMBER	REP CAT	QUANTITY/ UNITS	I/D	DESCRIPTION				AMOUNT		I/D	P/F		
01	0192	269	1920				4124															
02																						
03																						
04																						
05																						
06																						
07																						

## DOCUMENT TOTAL

**GAX** (03/05)

WARRANT #

AUDITED BY

PAID DATE



BUDGET FY FY06	GENERAL ACCOUNTING EXPENDITURE			DOCUMENT NUMBER	
	DATE <b>10/20/05</b>	ACCTG PERIOD (mm/yy) <b>09/05</b>			
VENDOR CODE		AGENCY NAME			
VENDOR NAME AND ADDRESS City of Davenport, Iowa Homeless Funding 226 W. 4 <sup>th</sup> Street Davenport, IA 52801		BILL TO ADDRESS (ORDERING AGENCY) Department of Economic Development Bureau of Community Facilities & Services 200 East Grand Avenue Des Moines, IA 50309		SHIP TO ADDRESS	
TERMS	FOB	ORDER APPROVED BY		GOODS RECEIVED/SERVICES PERFORMED	
QUANTITY	VENDOR'S INVOICE DATE	VENDOR'S INVOICE NUMBER		DATE	INITIALS
Contract Number: <b>05-ES-008</b>		Contract End Date: <b>06/30/06</b>		Report Number: <b>1</b>	Report Ending: <b>09/30/05</b>

## Emergency Shelter Grant Program (ESGP)

ACTIVITY Code / Title	ESGP Budget	Current Request	Total to Date
Rehabilitation	\$0	\$0	\$0
Essential Services	\$15,000	\$1,842	\$1,842
Operations	\$143,421	\$24,089	\$24,089
Homeless Prevention	\$36,000	\$4,724	\$4,724
Administration	\$0	\$0	\$0
<b>TOTALS</b>	<b>\$194,421</b>	<b>\$30,655</b>	<b>\$30,655</b>
		Less Funds Previously Requested	\$0
		<b>NET REQUEST</b>	<b>\$30,655</b>

<b>CLAIMANT'S CERTIFICATION</b> I CERTIFY THAT THE ITEMS FOR WHICH PAYMENT IS CLAIMED WERE FURNISHED FOR STATE BUSINESS UNDER THE AUTHORITY OF THE LAW AND THAT THE CHARGES ARE REASONABLE, PROPER, AND CORRECT, AND NO PART OF THIS CLAIM HAS BEEN PAID. DATE 10/20/05 TITLE Acct. II										<b>AGENCY CERTIFICATION</b> I CERTIFY THAT THE ABOVE EXPENSES WERE INCURRED AND THE AMOUNTS ARE CORRECT AND SHOULD BE PAID FROM THE FUNDS APPROPRIATED BY: CODE OR CHAPTER SECTION(S)  AUTHORIZED SIGNATURE											
CLAIMANT'S SIGNATURE																					
THE FOLLOWING FIELDS ARE FOR STATE ACCOUNTING USE ONLY																					
DOC TYPE GAX		DOC NUMBER		DOC DATE		ACCTG PRD		BUDGET FY		ACTION NEW/MOD E		PO SHIP INSTR		GAX TYPE 1		INT IND		INT SELLER FUND		INT SELLER AGCY	
VENDOR CODE		ADDR OVERRIDE		F/A INDICATOR		EFT IND		TEXT -po's only (y/N)		TEXT (po's only)											
REF DOC TYPE		REF DOC NUMBER		REF DOC LINE		COM LN		VEND INVOICE #		COMMODITY CODE		GS CONTRACT									
LINE	FUND	AGCY	ORG	SUB ORG	ACTV	FUNC	OBJT	SUB OBJT	JOB NUMBER	REP CAT	QUANTITY/ UNITS	I/D	DESCRIPTION	AMOUNT	I/D/P/F						
01	0340	269	4751				4125														
02																					
03																					
04																					
05																					
06																					
07																					

**DOCUMENT TOTAL**

**GAX** (03/05)

WARRANT #

AUDITED BY

PAID DATE



<b>ESGP - IDED HOMELESS FUND</b>	Recipient:	<u>City of Davenport</u>
	Contract Number:	<u>05-ES-008</u>
<b>REQUEST FOR PAYMENT/ACTIVITY STATUS</b>	Period Ending:	<u>09-30-05</u>

**PROVIDER DETAILS: BUDGET AND EXPENDITURES SINCE LAST REPORT**

	Provider Name / #	Admin	Rehab	Essential Services	Operations	Homeless Prevention	Total	Match	# Persons Served
<i>BUDGET</i>	<i>Fam.Res.</i>	\$	\$	\$	\$15,000	\$10,000	\$25,000	\$25,000	100
Since Last Rpt.	82001	\$	\$	\$	\$1,341	\$1,092	\$2,433	\$2,433	20
<i>BUDGET</i>	<i>HumMary</i>	\$	\$	\$	\$67,754	\$7,000	\$41,421	\$41,421	250
Since Last Rpt.	82002	\$	\$	\$	\$4,589	\$2,085	\$6,674	\$6,674	52
<i>BUDGET</i>	<i>JLCS</i>	\$	\$	\$15,000	\$16,000	\$15,000	\$46,000	\$46,000	215
Since Last Rpt.	82003	\$	\$	\$1,842	\$4,101	\$1,422	\$7,365	\$7,365	61
<i>BUDGET</i>	<i>SalvArmy</i>	\$	\$	\$	\$30,000	\$	\$30,000	\$30,000	100
Since Last Rpt.	82005	\$	\$	\$	\$	\$	\$	\$	0
<i>BUDGET</i>	<i>Val.Shelt.</i>	\$	\$	\$	\$30,000	\$	\$30,000	\$30,000	90
Since Last Rpt.	82006	\$	\$	\$	\$12,034	\$	\$12,034	\$12,034	45
<i>BUDGET</i>	<i>VeraFr.</i>	\$	\$	\$	\$18,000	\$4,000	\$22,000	\$22,000	50
Since Last Rpt.	82007	\$	\$	\$	\$2,024	\$125	\$2,149	\$2,149	22
<i>BUDGET</i>		\$	\$	\$	\$	\$	\$	\$	
Since Last Rpt.		\$	\$	\$	\$	\$	\$	\$	
<i>BUDGET</i>		\$	\$	\$	\$	\$	\$	\$	
Since Last Rpt.		\$	\$	\$	\$	\$	\$	\$	
<i>BUDGET</i>		\$	\$	\$	\$	\$	\$	\$	
Since Last Rpt.		\$	\$	\$	\$	\$	\$	\$	
<i>BUDGET</i>		\$	\$	\$	\$	\$	\$	\$	
Since Last Rpt.		\$	\$	\$	\$	\$	\$	\$	
<i>BUDGET</i>		\$	\$	\$	\$	\$	\$	\$	
Since Last Rpt.		\$	\$	\$	\$	\$	\$	\$	
<i>BUDGET</i>		\$	\$	\$	\$	\$	\$	\$	
Since Last Rpt.		\$	\$	\$	\$	\$	\$	\$	
<i>BUDGET</i>		\$	\$	\$	\$	\$	\$	\$	
Since Last Rpt.		\$	\$	\$	\$	\$	\$	\$	
<i>BUDGET</i>		\$	\$	\$	\$	\$	\$	\$	
Since Last Rpt.		\$	\$	\$	\$	\$	\$	\$	
<i>BUDGET</i>		\$	\$	\$	\$	\$	\$	\$	
Since Last Rpt.		\$	\$	\$	\$	\$	\$	\$	
<i>BUDGET</i>		\$	\$	\$	\$	\$	\$	\$	
Since Last Rpt.		\$	\$	\$	\$	\$	\$	\$	
<i>BUDGET</i>		\$	\$	\$	\$	\$	\$	\$	
Since Last Rpt.		\$	\$	\$	\$	\$	\$	\$	
<i>BUDGET</i>		\$	\$	\$	\$	\$	\$	\$	
Since Last Rpt.		\$	\$	\$	\$	\$	\$	\$	
<i>BUDGET</i>		\$	\$	\$	\$	\$	\$	\$	
Since Last Rpt.		\$	\$	\$	\$	\$	\$	\$	
<i>BUDGET</i>		\$	\$	\$	\$	\$	\$	\$	
Since Last Rpt.		\$	\$	\$	\$	\$	\$	\$	
<i>BUDGET</i>		\$	\$	\$	\$	\$	\$	\$	
Since Last Rpt.		\$	\$	\$	\$	\$	\$	\$	
<i>BUDGET</i>		\$	\$	\$	\$	\$	\$	\$	
Since Last Rpt.		\$	\$	\$	\$	\$	\$	\$	
<b>TOTALS</b>	<b>Budget:</b>	\$	\$	\$15,000	\$143,421	\$36,000	\$194,421	\$194,421	805
<b>Since Last Report:</b>		\$	\$	\$1,842	\$24,089	\$4,724	\$30,655	\$30,655	200

BUDGET FY	<b>GENERAL ACCOUNTING EXPENDITURE</b>				DOCUMENT NUMBER
	DATE	ACCTG PERIOD (mm/yy)			
VENDOR CODE			AGENCY NAME		
VENDOR NAME AND ADDRESS			BILL TO ADDRESS (ORDERING AGENCY) Department of Economic Development Bureau of Community Facilities & Services 200 East Grand Avenue Des Moines, IA 50309		SHIP TO ADDRESS
TERMS	FOB	ORDER APPROVED BY			GOODS RECEIVED/SERVICES PERFORMED DATE INITIALS
QUANTITY	VENDOR'S INVOICE DATE	VENDOR'S INVOICE NUMBER			
Contract Number:		Contract End Date:		Report Number:	Report Ending:

## HOMELESS SHELTER OPERATIONS GRANT (HSOGP)

ACTIVITY Code / Title	HSOG Budget	Current Request	Total to Date
Rehabilitation	\$	\$	\$
Essential Services	\$	\$	\$
Operations	\$	\$	\$
Homeless Prevention	\$	\$	\$
Administration	\$	\$	\$
<b>TOTALS</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>
Less Funds Previously Requested			\$
<b>NET REQUEST</b>			<b>\$30,655</b>

<p style="text-align: center;"><b>CLAIMANT'S CERTIFICATION</b></p> <p>I CERTIFY THAT THE ITEMS FOR WHICH PAYMENT IS CLAIMED WERE FURNISHED FOR STATE BUSINESS UNDER THE AUTHORITY OF THE LAW AND THAT THE CHARGES ARE REASONABLE, PROPER, AND CORRECT, AND NO PART OF THIS CLAIM HAS BEEN PAID.</p> <p style="text-align: center;">DATE 10/20/05 TITLE Acct. II</p>	<p style="text-align: center;"><b>AGENCY CERTIFICATION</b></p> <p>I CERTIFY THAT THE ABOVE EXPENSES WERE INCURRED AND THE AMOUNTS ARE CORRECT AND SHOULD BE PAID FROM THE FUNDS APPROPRIATED BY: <b>CODE OR CHAPTER SECTION(S)</b></p>
CLAIMANT'S SIGNATURE	AUTHORIZED SIGNATURE

THE FOLLOWING FIELDS ARE FOR STATE ACCOUNTING USE ONLY

DOC TYPE <b>GAX</b>	DOC NUMBER	DOC DATE	ACCTG PRD	BUDGET FY	ACTION NEW/MOD <b>E</b>	PO SHIP INSTR	GAX TYPE <b>1</b>	INT IND	INT SELLER FUND	INT SELLER AGCY
VENDOR CODE		ADDR OVERRIDE	F/A INDICATOR	EFT IND	TEXT -po's only (y/N)		TEXT (po's only)			
REF DOC TYPE	REF DOC NUMBER	REF DOC LINE	COM LN	VEND INVOICE #			COMMODITY CODE		GS CONTRACT	

LINE	FUND	AGCY	ORG	SUB ORG	ACTV	FUNC	OBJT	SUB OBJT	JOB NUMBER	REP CAT	QUANTITY/ UNITS	I/D	DESCRIPTION	AMOUNT	I/D/P/F
01	0192	269	1920				4124								
02															
03															
04															
05															
06															
07															

## DOCUMENT TOTAL

**GAX** (03/05)

WARRANT #

AUDITED BY

PAID DATE \_\_\_\_\_





BUDGET FY FY06	<b>GENERAL ACCOUNTING EXPENDITURE</b>				DOCUMENT NUMBER	
	DATE <b>10/20/05</b>	ACCTG PERIOD (mm/yy) <b>09/05</b>				
VENDOR CODE			AGENCY NAME			
VENDOR NAME AND ADDRESS City of Davenport, Iowa Homeless Funding 226 W. 4 <sup>th</sup> Street Davenport, IA 52801			BILL TO ADDRESS (ORDERING AGENCY) Department of Economic Development Bureau of Community Facilities & Services 200 East Grand Avenue Des Moines, IA 50309		SHIP TO ADDRESS	
TERMS	FOB	ORDER APPROVED BY			GOODS RECEIVED/SERVICES PERFORMED	
QUANTITY	VENDOR'S INVOICE DATE	VENDOR'S INVOICE NUMBER			DATE	INITIALS
Contract Number: <b>05-HES-000</b>		Contract End Date: <b>06/30/06</b>		Report Number: <b>1</b>	Report Ending:	<b>09/30/05</b>

## HOMELESS SHELTER OPERATIONS GRANT (HSOGP)

ACTIVITY Code / Title	HSOG Budget	Current Request	Total to Date
Rehabilitation	\$0	\$0	\$0
Essential Services	\$15,000	\$1,842	\$1,842
Operations	\$143,421	\$24,089	\$24,089
Homeless Prevention	\$36,000	\$4,724	\$4,724
Administration	\$0	\$0	\$0
<b>TOTALS</b>	<b>\$194,421</b>	<b>\$30,655</b>	<b>\$30,655</b>
Less Funds Previously Requested			\$0
<b>NET REQUEST</b>			<b>\$30,655</b>

CLAIMANT'S CERTIFICATION										AGENCY CERTIFICATION												
I CERTIFY THAT THE ITEMS FOR WHICH PAYMENT IS CLAIMED WERE FURNISHED FOR STATE BUSINESS UNDER THE AUTHORITY OF THE LAW AND THAT THE CHARGES ARE REASONABLE, PROPER, AND CORRECT, AND NO PART OF THIS CLAIM HAS BEEN PAID.										I CERTIFY THAT THE ABOVE EXPENSES WERE INCURRED AND THE AMOUNTS ARE CORRECT AND SHOULD BE PAID FROM THE FUNDS APPROPRIATED BY:												
DATE 10/20/05 TITLE Acct. II										CODE OR CHAPTER SECTION(S)												
CLAIMANT'S SIGNATURE										AUTHORIZED SIGNATURE												
THE FOLLOWING FIELDS ARE FOR STATE ACCOUNTING USE ONLY																						
DOC TYPE <b>GAX</b>		DOC NUMBER			DOC DATE		ACCTG PRD		BUDGET FY		ACTION NEW/MOD		PO SHIP INSTR		GAX TYPE <b>1</b>		INT IND		INT SELLER FUND		INT SELLER AGCY	
VENDOR CODE			ADDR OVERRIDE		F/A INDICATOR		EFT IND		TEXT -po's only (y/N)				TEXT (po's only)									
REF DOC TYPE		REF DOC NUMBER			REF DOC LINE		COM LN		VEND INVOICE #				COMMODITY CODE				GS CONTRACT					
LINE	FUND	AGCY	ORG	SUB ORG	ACTV	FUNC	OBJT	SUB OBJT	JOB NUMBER	REP CAT	QUANTITY/ UNITS	I/D	DESCRIPTION		AMOUNT		I/D	P/F				
01	<b>0192</b>	<b>269</b>	<b>1920</b>				<b>4124</b>															
02																						
03																						
04																						
05																						
06																						
07																						

## DOCUMENT TOTAL

**GAX** (03/05)

WARRANT #

AUDITED BY

PAID DATE \_\_\_\_\_



# HMIS Data Certification for ESG/HSOG Draws

The “Counting” version of the Provider Monthly Entry Detail Report from ServicePoint must be attached to your draw request.

There is a separate Provider Monthly Entry Detail Report for each calendar month. The report name includes the year and month as part of the report name. For example, the report of entries for the month of March 2005 would be named “Provider Monthly Entry Detail 200503.”

**Run and attach the counting version of the report that corresponds to your draw month.** For example, a draw for the month of July 2005 must include the counting version of the report titled “Provider Monthly Entry Detail 200507.”

**If a draw is submitted for more than one month at a time, the Provider Monthly Entry Detail report must be attached for each month submitted.**

## Instructions for running and printing the monthly report:

12. Log in to ServicePoint
13. Click on the green “Reports” tab at the top of the screen.
14. Click on “ReportWriter” at the bottom left of the screen. A new window will open.
15. In the new window, click on the green “Options” tab at the top of the window. An alphabetical list of saved reports will display. The report names are in the left column.
16. Scroll down through the list until you see the name of the report that you wish to run. Use your mouse to point to the report name (when you are pointing at the name, the name will display an underline).
17. Single click on the report name.
18. A pop-up message will display with the following message: “By loading a Quick Query you will over-write any unsaved changes. Are you sure you want to continue?”
19. Click OK
20. Click on the green “Counting” tab at the top of the window. The report may take several minutes to run.
21. When the report displays, point the mouse anywhere in the middle of the report and single-click the right button on the mouse. A small menu will pop up. To print the report, click “Print” on the pop-up menu.
22. **Write the month and year of the report on the printout.** At this time, the reporting tool does not display the name of the report you have just printed, so it must be hand-written. Include the report with your draw request.

## Sample Report:



Iowa Homeless Management Information Network / Des Moines

[Preview](#) [Tables](#) [Fields](#) [Filters](#) [Counting](#) [Options](#) [Start Over](#) [Exit](#)

Total rows in this report: 1560

Unique clients in this report: 1385

Duplicate clients in this report: 115

### SSN Quality

<a href="#">Full SSN Reported (HUD)</a>	<a href="#">1003</a>
<a href="#">Don't Know or Don't Have SSN (HUD)</a>	<a href="#">140</a>
<a href="#">Refused (HUD)</a>	<a href="#">31</a>
<a href="#">Partial SSN Reported (HUD)</a>	<a href="#">16</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">1190</a>
<a href="#">NULL</a>	<a href="#">370</a>
<b>TOTAL</b>	<b>1560</b>

### Entry Type

<a href="#">HUD-40118</a>	<a href="#">1541</a>
<a href="#">Basic Entry/Exit</a>	<a href="#">19</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">1560</a>
<a href="#">NULL</a>	<a href="#">0</a>
<b>TOTAL</b>	<b>1560</b>

### Primary\_Race

<a href="#">White (HUD)</a>	<a href="#">1078</a>
<a href="#">Black or African American (HUD)</a>	<a href="#">350</a>
<a href="#">American Indian or Alaska Native (HUD)</a>	<a href="#">57</a>
<a href="#">Asian (HUD)</a>	<a href="#">5</a>
<a href="#">Native Hawaiian or Other Pacific Islander (HUD)</a>	<a href="#">2</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">1492</a>
<a href="#">NULL</a>	<a href="#">68</a>
<b>TOTAL</b>	<b>1560</b>

### 2nd\_Race

<a href="#">White (HUD)</a>	<a href="#">89</a>
<a href="#">Black or African American (HUD)</a>	<a href="#">16</a>
<a href="#">American Indian or Alaska Native (HUD)</a>	<a href="#">9</a>
<a href="#">Other</a>	<a href="#">2</a>
<a href="#">Other Multi-Racial</a>	<a href="#">1</a>
<a href="#">Asian (HUD)</a>	<a href="#">1</a>
<a href="#">Native Hawaiian or Other Pacific Islander (HUD)</a>	<a href="#">1</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">119</a>
<a href="#">NULL</a>	<a href="#">1441</a>
<b>TOTAL</b>	<b>1560</b>

### Gender

<a href="#">Male</a>	<a href="#">806</a>
<a href="#">Female</a>	<a href="#">731</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">1537</a>
<a href="#">NULL</a>	<a href="#">23</a>
<b>TOTAL</b>	<b>1560</b>

### Ethnicity

<a href="#">Other (Non-Hispanic/Latino)</a>	<a href="#">1220</a>
<a href="#">Hispanic/Latino</a>	<a href="#">131</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">1351</a>
<a href="#">NULL</a>	<a href="#">209</a>
<b>TOTAL</b>	<b>1560</b>

# SAMPLE ONLY

### General Health

<a href="#">Good (HUD)</a>	<a href="#">466</a>
<a href="#">Fair (HUD)</a>	<a href="#">147</a>
<a href="#">Very Good (HUD)</a>	<a href="#">129</a>
<a href="#">Excellent (HUD)</a>	<a href="#">108</a>
<a href="#">Don't Know (HUD)</a>	<a href="#">64</a>

### Pregnant?

<a href="#">No</a>	<a href="#">827</a>
<a href="#">Yes</a>	<a href="#">34</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">861</a>
<a href="#">NULL</a>	<a href="#">699</a>

### In School?

<a href="#">No</a>	<a href="#">828</a>
<a href="#">Yes</a>	<a href="#">152</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">980</a>
<a href="#">NULL</a>	<a href="#">580</a>

<a href="#">Poor (HUD)</a>	<a href="#">56</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">970</a>
<a href="#">NULL</a>	<a href="#">590</a>
<b>TOTAL</b>	<b>1560</b>

<b>TOTAL</b>	<b>1560</b>
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<b>TOTAL</b>	<b>1560</b>
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<b>Disability?</b>	
<a href="#">No (HUD)</a>	<a href="#">685</a>
<a href="#">Yes (HUD)</a>	<a href="#">336</a>
<a href="#">Don't Know (HUD)</a>	<a href="#">59</a>
<a href="#">Refused (HUD)</a>	<a href="#">9</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">1089</a>
<a href="#">NULL</a>	<a href="#">471</a>
<b>TOTAL</b>	<b>1560</b>

<b>Homeless?</b>	
<a href="#">Yes</a>	<a href="#">1128</a>
<a href="#">No</a>	<a href="#">204</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">1332</a>
<a href="#">NULL</a>	<a href="#">228</a>
<b>TOTAL</b>	<b>1560</b>

<b>Chronic?</b>	
<a href="#">No</a>	<a href="#">927</a>
<a href="#">Yes</a>	<a href="#">254</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">1181</a>
<a href="#">NULL</a>	<a href="#">379</a>
<b>TOTAL</b>	<b>1560</b>

<b>Extent?</b>	
<a href="#">First Time Homeless</a>	<a href="#">441</a>
<a href="#">1-2 times in the past</a>	<a href="#">327</a>
<a href="#">Chronic: 4 times in past 3 years</a>	<a href="#">138</a>
<a href="#">Long term: 2 years or more</a>	<a href="#">91</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">997</a>
<a href="#">NULL</a>	<a href="#">563</a>
<b>TOTAL</b>	<b>1560</b>

<b>Homeless Primary Reason</b>	
<a href="#">Addiction</a>	<a href="#">164</a>
<a href="#">Domestic Violence</a>	<a href="#">155</a>
<a href="#">Evicted</a>	<a href="#">150</a>
<a href="#">Other</a>	<a href="#">132</a>
<a href="#">Unemployment</a>	<a href="#">114</a>
<a href="#">Divorce/Separated/Family Breakup</a>	<a href="#">88</a>
<a href="#">Unable to Pay Rent/Mortgage</a>	<a href="#">83</a>
<a href="#">Jail/Prison</a>	<a href="#">46</a>
<a href="#">Physical/Mental Disabilities</a>	<a href="#">46</a>

<b>Living Situation</b>	
<a href="#">Rental House/Apartment (HUD)</a>	<a href="#">263</a>
<a href="#">Emergency Shelter (HUD)</a>	<a href="#">213</a>
<a href="#">Living With Family (HUD)</a>	<a href="#">189</a>
<a href="#">Living With Friends (HUD)</a>	<a href="#">156</a>
<a href="#">Place not meant for habitation (HUD)</a>	<a href="#">77</a>
<a href="#">Transitional Housing for Homeless(HUD)</a>	<a href="#">64</a>
<a href="#">Own House/Apartment (HUD)</a>	<a href="#">61</a>
<a href="#">Other (HUD)</a>	<a href="#">24</a>
<a href="#">Hotel/Motel without emergency shelter (HUD)</a>	<a href="#">21</a>

<a href="#">Mov</a>	
<a href="#">Fam</a>	
<a href="#">Relc</a>	
<a href="#">Red</a>	
<a href="#">Incc</a>	
-	-
<a href="#">NOT NULL</a>	<a href="#">1115</a>
<a href="#">NULL</a>	<a href="#">445</a>
<b>TOTAL</b>	<b>1560</b>

SAMPLE ONLY

<b>LengthofStay</b>	
<a href="#">More than one week, but less than one month (HUD)</a>	<a href="#">215</a>
<a href="#">One week or less (HUD)</a>	<a href="#">200</a>
<a href="#">More than three months, but less than one year (HUD)</a>	<a href="#">196</a>
<a href="#">One year or longer (HUD)</a>	<a href="#">192</a>
<a href="#">One to three months (HUD)</a>	<a href="#">165</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">968</a>

<b>Zip Quality</b>	
<a href="#">Full Zip Code Recorded (HUD)</a>	<a href="#">870</a>
<a href="#">Don't Know (HUD)</a>	<a href="#">127</a>
<a href="#">Refused (HUD)</a>	<a href="#">3</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">1000</a>
<a href="#">NULL</a>	<a href="#">560</a>
<b>TOTAL</b>	<b>1560</b>

<b>D.V.</b>	
<a href="#">No</a>	<a href="#">682</a>
<a href="#">Yes</a>	<a href="#">267</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">949</a>
<a href="#">NULL</a>	<a href="#">611</a>
<b>TOTAL</b>	<b>1560</b>

<a href="#">NULL</a>	<a href="#">592</a>
<b>TOTAL</b>	<b>1560</b>

<b>D.V._Extent</b>	
<a href="#">Within the past three months (HUD)</a>	<a href="#">120</a>
<a href="#">More than a year ago (HUD)</a>	<a href="#">63</a>
<a href="#">Don't know (HUD)</a>	<a href="#">33</a>
<a href="#">Three to six months ago (HUD)</a>	<a href="#">26</a>
<a href="#">Refused (HUD)</a>	<a href="#">5</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">247</a>
<a href="#">NULL</a>	<a href="#">1313</a>
<b>TOTAL</b>	<b>1560</b>

<b>Unemployed?</b>	
<a href="#">Yes</a>	<a href="#">659</a>
<a href="#">No</a>	<a href="#">233</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">892</a>
<a href="#">NULL</a>	<a href="#">668</a>
<b>TOTAL</b>	<b>1560</b>

<b>Looking for Work</b>	
<a href="#">Yes</a>	<a href="#">392</a>
<a href="#">No</a>	<a href="#">277</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">669</a>
<a href="#">NULL</a>	<a href="#">891</a>
<b>TOTAL</b>	<b>1560</b>

<b>Employment Tenure</b>	
<a href="#">Permanent (HUD)</a>	<a href="#">83</a>
<a href="#">Temporary (HUD)</a>	<a href="#">77</a>
<a href="#">Seasonal (HUD)</a>	<a href="#">10</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">170</a>
<a href="#">NULL</a>	<a href="#">1390</a>
<b>TOTAL</b>	<b>1560</b>

<b>Highest Education</b>	
<a href="#">High School Diploma (HUD)</a>	<a href="#">301</a>
<a href="#">GED (HUD)</a>	<a href="#">128</a>
<a href="#">Post-secondary school (HUD)</a>	<a href="#">101</a>
<a href="#">11th grade (HUD)</a>	<a href="#">82</a>
<a href="#">10th</a>	
<a href="#">12th (HUD)</a>	
<a href="#">9th</a>	
-	
<a href="#">NOT NULL</a>	<a href="#">755</a>
<a href="#">NULL</a>	<a href="#">805</a>
<b>TOTAL</b>	<b>1560</b>

<b>Vocational Training?</b>	
<a href="#">No</a>	<a href="#">607</a>
<a href="#">Yes</a>	<a href="#">107</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">714</a>

SAMPLE ONLY

<b>Veteran</b>	
<a href="#">No (HUD)</a>	<a href="#">1050</a>
<a href="#">Yes (HUD)</a>	<a href="#">118</a>
<a href="#">Don't Know (HUD)</a>	<a href="#">27</a>
<a href="#">Refused (HUD)</a>	<a href="#">1</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">1196</a>
<a href="#">NULL</a>	<a href="#">364</a>
<b>TOTAL</b>	<b>1560</b>

<b>Discharge Type</b>	
<a href="#">Honorable (HUD)</a>	<a href="#">48</a>
<a href="#">General (HUD)</a>	<a href="#">9</a>
<a href="#">Other (HUD)</a>	<a href="#">5</a>
<a href="#">Medical (HUD)</a>	<a href="#">3</a>
<a href="#">Bad Conduct (HUD)</a>	<a href="#">1</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">66</a>
<a href="#">NULL</a>	<a href="#">1494</a>
<b>TOTAL</b>	<b>1560</b>

<b>In War Zone?</b>	
<a href="#">No</a>	<a href="#">90</a>
<a href="#">Yes</a>	<a href="#">22</a>
-	-
<a href="#">NOT NULL</a>	<a href="#">112</a>
<a href="#">NULL</a>	<a href="#">1448</a>
<b>TOTAL</b>	<b>1560</b>

SAMPLE ONLY

## Appendix 3

- Chapter 24 - Emergency Shelter Grants Program
- Chapter 29 - Homeless Shelter Operation Grants Program
- ESGP HUD DeskGuide Section

## CHAPTER 24

### EMERGENCY SHELTER GRANTS PROGRAM

**261—24.1(PL100-628) Purpose.** The program is designed to help improve the quality of services to the homeless, to make available needed services, to help meet the costs of providing essential social services so that homeless individuals have access not only to safe and sanitary shelter, but also to the supportive services and other types of assistance they need to improve their situations.

**261—24.2(PL100-628) Definitions.**

*“Applicant”* means a provider of homeless services applying for funds through the ESG program.

*“Domestic violence shelter”* means a shelter primarily serving clients who are homeless due to domestic violence.

*“ESG program”* or *“ESGP”* means the emergency shelter grants program.

*“Grantee”* means a qualifying city government, county government, or nonprofit organization receiving funds under this chapter.

*“Homeless”* or *“homeless individual”* means:

1. An individual who lacks a fixed, regular, and adequate nighttime residence; and
  2. An individual who has a primary nighttime residence that is:
    - \_ A supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);
    - \_ An institution that provides a temporary residence for individuals intended to be institutionalized;
- or
- \_ A public or private place not designated for, or ordinarily used as, a regular sleeping accommodation for human beings.

*“HUD”* means the U.S. Department of Housing and Urban Development.

*“HUD Desk Guide”* means the document provided by HUD which supplements the federal regulations outlined by 24 Code of Federal Regulations Part 576 (June 1, 1999).

*“IDED”* means the Iowa department of economic development.

*“Major rehabilitation”* means rehabilitation that involves costs in excess of 75 percent of the value of the building before rehabilitation.

*“Nonprofit recipient”* means any private, nonprofit organization to which a unit of general local government distributes ESGP funds to provide assistance to the homeless. For purposes of this chapter, a nonprofit recipient is a subgrantee.

*“Obligated”* means that the grantee has placed orders, awarded contracts, received services, or entered similar transactions that require payment from the grant amount. Grant amounts awarded by IDED by a written agreement or letter of award requiring payment from the grant amounts are obligated.

*“Private, nonprofit organization”* means a secular or religious organization described in Section 501(c) of the Internal Revenue Code which:

1. Is exempt from taxation under Subtitle A of the Internal Revenue Code,
2. Has an accounting system and a voluntary board, and
3. Practices nondiscrimination in the provision of services to clients.

*“Project”* means an activity or activities undertaken by the applicant to be carried out at a specific facility or location. No more than one project shall be funded at any one facility or location.

*“Rehabilitation”* means repair directed toward an accumulation of deferred maintenance; replacement of principal fixtures and components of existing buildings; installation of security devices; and improvement through alterations or additions to, or enhancements of, existing buildings, including improvements to increase the efficient use of energy in buildings. Costs of rehabilitation may include labor, materials, tools, and other costs of improving buildings.

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*“Renovation”* means rehabilitation that involves costs of 75 percent or less of the value of the building before rehabilitation.

*“ServicePoint”* means the data collection system used by IDED to collect information about homeless and near homeless Iowans.

*“Value of the building”* means the monetary value assigned to a building by an independent real estate appraiser, or as otherwise reasonably established by the grantee.

**261—24.3(PL100-628) Eligible applicants.** City governments, county governments, and private, nonprofit organizations are eligible applicants under the emergency shelter grants program. City or county governments may apply on behalf of a service provider within their jurisdictions when the nonprofit organization serves homeless and near homeless clients by providing overnight shelter, meals, clothing, transportation, counseling, child care, legal services, medical services, transitional housing services, and other services eligible under the emergency shelter grants program as determined by the U.S. Department of Housing and Urban Development.

**261—24.4(PL100-628) Eligible activities.** Eligible activities are based on guidelines established by the Stewart B. McKinney Homeless Assistance Amendment Act of 1987 and further defined in 24 Code of Federal Regulations Part 576 (June 1, 1999) and the HUD Desk Guide section 3. Activities



assisted by this program may include only the following:

1. Rehabilitation, renovation, or conversion of buildings for use as providers of services for the homeless. Rehabilitation activities shall be allowed a maximum cost of \$10,000 per project.
2. Provision of essential services if the service is a new service or a quantifiable increase in the level of service. No more than 30 percent of the IDED annual grant amount may be used for this purpose.
3. Payment of emergency shelter and transitional housing operating costs including shelter maintenance, operations, rent, repairs, security, fuel, equipment, insurance, utilities, food and furnishings. Staff salaries, including fringe benefits, paid under the operating cost category are limited to 10 percent of the grant amount. Maintenance and security costs are not subject to the 10 percent standard.
4. Payment for eligible activities that assist in prevention of homelessness. Grants may be made for homeless prevention as long as the total amount of such grants does not exceed 30 percent of the total emergency shelter grants program allocation. Examples of eligible activities include, but are not limited to, short-term subsidies to help defray rent and utility arrearages for families faced with eviction or termination of utility services; security deposits or first month's rent to enable a family to acquire its own apartment; programs to provide mediation services for landlord-tenant disputes; or programs to provide legal representation to indigent tenants in eviction proceedings. Other possible types of homeless prevention efforts include making needed payments to prevent a home from falling into foreclosure.
5. Administrative costs. A grantee may use a portion of a grant received for administrative purposes as determined by IDED. The maximum allowed for these administrative costs shall be 5 percent of the state ESGP allocation. IDED reserves the authority for distribution of administrative funds.

**261—24.5(PL100-628) Ineligible activities.** The general rule is that any activity that is not authorized under the provision of P.L. 100-628 is ineligible to be carried out with emergency shelter grants program funds. The following are items specially listed as ineligible in 24 Code of Federal Regulations Part 576 (June 1, 1999).

1. Acquisition or new construction of an emergency shelter for the homeless;
2. Rehabilitation administration, such as preparation of work specification, loan processing, or inspections;

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3. Renovation, rehabilitation, or conversion of buildings owned by primarily religious organizations or entities unless the activity complies with all the requirements as outlined in 24 CFR 576.23(a) and (b).

**261—24.6(PL100-628) Application procedures.** The Iowa department of economic development will request applications from eligible applicants as often as the state expects funding from the U.S. Department of Housing and Urban Development (HUD). Applicants will be given at least 30 days in which to reply to the state's request. The Iowa department of economic development will make funding decisions in conjunction with the time frame established by HUD. The application must be submitted on forms prescribed by IDED and must, at a minimum, include the amount of funds requested, the need for the funds, documentation of other available funding sources, source of required local match, and estimated number of persons to be served by the applicant (daily average). No individual project may receive more than \$50,000 annually. Applicants may receive a maximum of \$125,000 in ESGP funds annually. A minimum grant level of \$10,000 is required per applicant. No more than one project per applicant shall be funded at any one facility or location.

**261—24.7(PL100-628) Application review process.** The following procedures will be used in the review of applications received under the emergency shelter grants program.

**24.7(1)** Applications will be reviewed by a panel of the staff of the Iowa department of economic development and coordinated with representatives of other homeless assistance programs. Applications will be reviewed to determine eligibility based on the following criteria:

- a. The identified community need for the funds, including the number of clients proposed to be served, the current unmet need in the community, geographic area of service, and common factors leading to the need for the service. Maximum 25 points.
- b. The comprehensiveness and flexibility of the proposed program, including how the applicant proposes to meet the total and special needs of its clients and how homeless assistance is integrated with other programs. Maximum 25 points.
- c. The accessibility of the applicant's proposed services to its clients, including how well the applicant promotes its services within the community, any barriers to service, and any networking with other service providers in the area. Maximum 15 points.
- d. How well the applicant deals with cultural diversity within its community. Maximum 10 points.
- e. Any partnerships or collaborations between the applicant and other programs within the organization or with other organizations performing similar or complementary services. Maximum 15 points.
- f. A description of specific outcome measures for short- or long-term objectives for clients. An applicant's past performance, if applicable, shall be assessed in terms of its ability to meet performance targets. Maximum 25 points.

g. How well the applicant maximizes or leverages resources. Maximum 20 points.  
h. Threshold criteria. Applicants shall demonstrate capacity for grant administration as evidenced by previous satisfactory grant administration or by providing evidence of administrative ability to administer such a grant.

**24.7(2)** If an application contains an activity determined to be ineligible under the ESG program, the ineligible activity will be deleted from the application or referred to another funding source, if applicable.

**24.7(3)** IDED staff reserves the right to negotiate directly with the applicant to determine the priority of funding requested within the application.

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**24.7(4)** IDED staff may also review applications with the department of human rights, department of human services, or other groups with expertise in the area of serving homeless persons before making final funding recommendations. Consultation with other agencies is intended to avoid duplication and promote maximum utilization of funding sources. Based on the review process, IDED may revise the overall funding request by activity or funding level and recommend a final funding figure to the director of IDED for approval. Applicants receiving funding will not receive less than a \$10,000 award.

**24.7(5)** A city or county government or nonprofit organization may be designated, at the discretion of IDED, to administer a contract for multiple applicants within a prescribed geographic area.

**24.7(6)** IDED reserves the right to negotiate all aspects of a funding request prior to final approval.

**24.7(7)** Applicants that receive awards will receive funding for a one-year period.

**261—24.8(PL100-628) Matching requirement.** Each recipient of emergency shelter grants program funds must match the grant amount with an equal amount. This may come from the grantee, or through nonprofit recipients whose contracts are being administered by a local city or county government. In calculating the amount of matching funds, the following may be included: the value of any donated material or building used in the project, the value of any lease on a building used in the project, any salary paid to staff of the grantee or to any state recipient in carrying out the emergency shelter program, and the time and services contributed by volunteers at the rate of \$5 per hour. For purposes of this rule, IDED will determine the value of any donated material or building, or any lease, using any method reasonably calculated to establish fair market value. The state may grant an exemption of matching funds up to a maximum of \$100,000 of the state allocation received from HUD for the recipients least capable of providing such matching amounts. The recipient must document its need to participate in this exemption from matching requirements, and must receive prior approval from IDED before the exemption will be effective.

**261—24.9(PL100-628) Grant awards.** Grants will be awarded to individual applicants. IDED may award a grant to a city or county government or a nonprofit organization on behalf of multiple applicants, at the discretion of IDED and with the approval of those applicants affected and the local governmental unit. If a city, county or nonprofit organization is designated as the grantee of an award, that city, county or nonprofit organization will be responsible for coordination of requests for funds by eligible private, nonprofit recipients within its jurisdiction by consolidating them into one contract between the local governmental unit or nonprofit organization and IDED. IDED reserves the right to negotiate the amount of the grant award, the scale of the project, and alternative methods for completing the project.

**261—24.10(PL100-628) Restrictions placed on grantees.**

**24.10(1)** *Use as provider of homeless services.* Any building for which emergency shelter grants program funds are used must be maintained as a provider of homeless services for not less than a three-year period, or for not less than a ten-year period if the grant amounts are used for major rehabilitation or conversion of the building. All other operating and maintenance costs have a one-year requirement. In calculating the applicable time period, the three- and ten-year periods are determined as follows:

- a. In the case of a building that was not operated as a provider of services for the homeless before receipt of grant funds, on the date of initial occupancy as a provider of services to the homeless.
- b. In the case of a building that was operated as a provider of services to the homeless before the receipt of grant funds, on the date that grant funds are first obligated to the homeless service provider.

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**24.10(2)** *Building standards.* Any building for which emergency shelter grants program funds are used for renovation, conversion, rehabilitation, or major rehabilitation must meet the local government standard of being safe and in sanitary condition.

**24.10(3)** *Assistance to the homeless.* Homeless individuals must be given assistance in obtaining:

- a. Appropriate supportive services including permanent housing, medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living; and
- b. Other federal, state, local, and private assistance available to them.

**24.10(4)** *Participation by homeless individuals and families.*

- a. Recipients of ESGP funds must certify that they involve, through employment, volunteer

services, or otherwise, homeless individuals and families, to the maximum extent practicable, in construction, renovation, maintenance, and operation of assisted facilities.

*b.* Local government recipients or qualified subrecipients must have the participation of at least one homeless person or formerly homeless person on their board of directors or equivalent policymaking entity. The Secretary of HUD may grant a waiver to the recipient if the recipient agrees to otherwise consult with homeless or formerly homeless individuals when making policy decisions.

**24.10(5) Termination of assistance.** Recipients or qualified subrecipients must establish and implement a formal process to terminate assistance to individuals or families who violate program requirements. This process must include a hearing that provides individuals a full opportunity to address issues of noncompliance.

**24.10(6) Data reporting system.** Recipients shall participate in the HUD-approved Homeless Management Information System (HMIS) developed by IDED as required in the executed contract.

**261—24.11(PL100-628) Compliance with applicable federal and state laws and regulations.**

All grantees shall comply with the Iowa Code governing activities performed under this program and with all applicable provisions of the Stewart B. McKinney Homeless Assistance Amendment Act of 1987 and its implementing regulations. Use of ESGP funds must comply with the following additional requirements.

**24.11(1) Nondiscrimination and equal opportunity.** All grantees must comply with the following:

*a.* The requirements of Title VIII of the Civil Rights Act of 1968, 42 U.S.C. 3601-19 and implementing regulations; Executive Order 11063 and implementing regulations at 24 CFR Part 107 (June 1, 1999); and Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2002d) and its implementing regulations at 24 CFR Part 1 (June 1, 1999).

*b.* Affirmative action requirements as implemented with Executive Orders 11625, 12432, and 12138 which require that every effort be made to solicit the participation of minority and women business enterprises (MBE/WBE) in governmental projects.

*c.* The prohibitions against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101-07).

*d.* The prohibitions against discrimination against disabled individuals under Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act.

**24.11(2) Auditing.** Auditing requirements are as outlined in the Single Audit Act of 1996 and the implementing regulations found in OMB Circular A-133.

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**261—24.12(PL100-628) Administration.**

**24.12(1) Contracts.** Upon selection of an application for funding, IDED will issue a contract.

The contract shall be between IDED and the designated grantee as determined by IDED. If a local city or county government or a nonprofit organization is designated as the grantee, the private, nonprofit providers covered through the contract shall remain responsible for adherence to the requirements of the ESG program, including these rules. These rules and applicable federal and state laws and regulations become part of the contract. Certain activities may require that permits or clearances be obtained from other state or federal agencies prior to proceeding with the project. Grant awards may be conditioned upon the timely completion of these requirements.

**24.12(2) Record keeping and retention.** Financial records, supporting documents, statistical records, and all other records pertinent to the grant program shall be retained by the grantee. Private, nonprofit recipients covered through an ESGP contract from a local city or county government or nonprofit organization are responsible for ensuring that pertinent records of their ESGP funds be made available to the administering city or county or nonprofit organization and to IDED upon request. Proper record retention must be in accordance with the following:

*a.* Records for any assisted activity shall be retained for three years after final closeout and, if applicable, until audit procedures are completed and accepted by IDED;

*b.* Representatives of the Secretary of the U.S. Department of Housing and Urban Development, the Inspector General, the General Accounting Office, the state auditor's office, and IDED shall have access to all books, accounts, documents, records, and other property belonging to or in use by a grantee pertaining to the receipt of assistance under these rules.

**24.12(3) Reporting requirements.** Grantees shall submit reports to IDED as prescribed in the contract. These reports are:

*a. ServicePoint data reports.* All recipients of ESGP funds are required to submit monthly reports on clients served using the ServicePoint reporting process as prescribed by IDED; provided, however, that a recipient that qualifies as a domestic violence shelter shall not be required to report personally identifiable information about its homeless domestic violence clients. "Personally identifiable information" shall include any information that the reporting domestic violence shelter reasonably determines could be used to identify a particular client.

*b. ESGP Form-1, Request for Funds.* Grantees must submit requests for funds as needed during the contract year as prescribed by IDED. IDED may perform any review or field inspections it deems necessary to ensure program compliance, including review of grantee records and reports. When problems of compliance are noted, IDED may require remedial actions to be taken. Failure to respond to notifications of need for remedial action may result in the implementation of 24.12(5).

**24.12(4) Amendments to contracts.** Contracts may be amended on an individual basis in emergency

situations. Any request to amend a contract must be submitted in writing by the chief elected official to IDED. IDED will determine if the request to amend is justified based on the material presented in the letter of request. No amendment is valid until approved in writing by IDED.

**24.12(5) Remedies for noncompliance.** At any time before project closeout, IDED may, for cause, find that a grantee is not in compliance with the requirements under this program. At IDED's discretion, remedies for noncompliance may include the following:

- a. Issue a warning letter that further failure to comply with program requirements within a stated period of time will result in a more serious action.
- b. Condition a future grant.
- c. Direct the grantee to stop incurring costs with grant funds.
- d. Require that some or all of the grant amounts be remitted to the state.
- e. Reduce the levels of funds the recipient would otherwise be entitled to receive.

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f. Elect not to provide future grant funds to the recipient until appropriate actions are taken to ensure compliance. Reasons for a finding of noncompliance include, but are not limited to: the grantee's use of program funds for activities not described in its application, the grantee's failure to complete approved activities in a timely manner, the grantee's failure to comply with any applicable state or federal rules or regulations, or the lack of continuing capacity by the grantee to carry out the approved program in a timely manner.

These rules are intended to implement Iowa Code section 15.108(1) "a."

[Filed emergency 3/20/87—published 4/8/87, effective 3/20/87]

[Filed emergency 2/4/88—published 2/24/88, effective 2/5/88]

[Filed emergency 12/22/89—published 1/10/90, effective 12/22/89]

[Filed 2/28/90, Notice 1/10/90—published 3/21/90, effective 4/25/90]

[Filed emergency 2/22/91—published 3/20/91, effective 2/22/91]

[Filed emergency 2/25/92—published 3/18/92, effective 2/25/92]

[Filed emergency 12/18/92—published 1/6/93, effective 12/18/92]

[Filed 11/17/95, Notice 10/11/95—published 12/6/95, effective 1/10/96]

[Filed 6/18/99, Notice 4/7/99—published 7/14/99, effective 8/18/99]

[Filed 12/22/00, Notice 11/15/00—published 1/10/01, effective 2/14/01]

[Filed 3/29/01, Notice 2/7/01—published 4/18/01, effective 5/23/01]

[Filed 11/21/02, Notice 9/18/02—published 12/11/02, effective 1/15/03]

[Filed emergency 10/22/04 after Notice 9/15/04—published 11/10/04, effective 10/22/04]

[Filed emergency 12/16/04—published 1/19/05, effective 12/16/04]

## CHAPTER 29

### HOMELESS SHELTER OPERATION GRANTS PROGRAM

**261—29.1(15) Purpose.** The program is designed to help improve the quality of services to the homeless; to make available additional needed services; and to help meet the costs of providing essential social services so that homeless individuals have access not only to safe and sanitary shelter, but also to the supportive services and other types of assistance they need to improve their situations.

**261—29.2(15) Definitions.**

“*Applicant*” means a provider of homeless services applying for funds through the homeless shelter operation grants program.

“*Domestic violence shelter*” means a shelter primarily serving clients who are homeless due to domestic violence.

“*Grantee*” means a qualifying city government, county government, or nonprofit organization receiving funds under this chapter.

“*Homeless*” or “*homeless individual*” means:

1. An individual who lacks a fixed, regular, and adequate nighttime residence; and
  2. An individual who has a primary nighttime residence that is:
    - \_ A supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);
    - \_ An institution that provides a temporary residence for individuals intended to be institutionalized;
- or
- \_ A public or private place not designated for, or ordinarily used as, a regular sleeping accommodation for human beings.

“*HSOG*” means the homeless shelter operation grants program.

“*HUD*” means the U.S. Department of Housing and Urban Development.

“*IDED*” means the Iowa department of economic development.

“*Legislature*” means the Iowa general assembly.

“*Nonprofit recipient*” means any private, nonprofit organization to which a unit of general local government distributes HSOG funds to provide assistance to the homeless. For purposes of this chapter, a nonprofit recipient is a subgrantee.

“*Obligated*” means that the grantee has placed orders, awarded contracts, received services, or entered similar transactions that require payment from the grant amount. Grant amounts awarded by IDED by a written agreement or letter of award requiring payment from the grant amounts are obligated.

“*Private, nonprofit organization*” means a secular or religious organization described in Section 501(c) of the Internal Revenue Code which:

1. Is exempt from taxation under Subtitle A of the Internal Revenue Code,
2. Has an accounting system and a voluntary board, and
3. Practices nondiscrimination in the provision of assistance to homeless clients.

“*Project*” means an activity or activities undertaken by the applicant to be carried out at a specific facility or location. No more than one project shall be funded at any one facility or location.

“*Rehabilitation*” means repair directed toward an accumulation of deferred maintenance; replacement of principal fixtures and components of existing buildings; installation of security devices; and improvement through alterations or additions to, or enhancements of, existing buildings, including improvements to increase the efficient use of energy in buildings. Costs of rehabilitation may include labor, materials, tools, and other costs of improving buildings.

“*Renovation*” means rehabilitation that involves costs of 75 percent or less of the value of the building before rehabilitation.

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“*ServicePoint*” means the data collection system used to collect information about homeless and near homeless Iowans.

“*Value of the building*” means the monetary value assigned to a building by an independent real estate appraiser, or as otherwise reasonably established by the grantee.

**261—29.3(15) Eligible applicants.** City governments, county governments, and private, nonprofit organizations are eligible applicants under the homeless shelter operation grants program.

**261—29.4(15) Eligible activities.** Activities assisted by this program may include but are not limited to the following:

1. Rehabilitation, renovation, or conversion of buildings for use as providers of services for the homeless. Rehabilitation activities shall be allowed a maximum cost of \$10,000 per project.
2. Provision of essential services if the service is a new service or a quantifiable increase in the level of service.
3. Payment of normal operating expenses that include staff salaries, maintenance, insurance, utilities, furnishings, and all other documented normal operating expenses.
4. Payment for eligible activities that assist in prevention of homelessness. Examples of eligible activities include, but are not limited to, short-term subsidies to help defray rent and utility arrearages for families faced with eviction or termination of utility services; security deposits or first month’s rent to enable a family to acquire its own apartment; programs to provide mediation services

for landlord-tenant disputes; or programs to provide legal representation to indigent tenants in eviction proceedings. Other possible types of homeless prevention efforts include making needed payments to prevent a home from falling into foreclosure.

5. Administrative costs. A grantee may use a portion of a grant received for administrative purposes as determined by IDED. The maximum allowed for these administrative costs shall be 5 percent of the state of Iowa's HSOG allocation. IDED reserves the authority to determine the distribution of administrative funds.

**261—29.5(15) Ineligible activities.** The general rule is that any activity that is not allowed under 261—29.4(15) is ineligible to be carried out with homeless shelter operation grants program funds.

The following items are ineligible under this rule:

1. Acquisition or new construction of an emergency shelter for the homeless;
2. Rehabilitation services, such as preparation of work specifications, loan processing, or inspections;
3. Renovation, rehabilitation, or conversion of buildings owned by primarily religious organizations or entities, unless the activity complies with all the requirements as outlined in HUD CFR 576.23(a) and (b).

**261—29.6(15) Application procedures.**

**29.6(1)** The Iowa department of economic development will request applications from eligible applicants as often as the state expects funding for the HSOG program. Applicants will be given at least 30 days in which to reply to the state's request for applications. The application must be submitted on forms prescribed by IDED and the application must, at a minimum, include the amount of funds requested, the need for the funds, documentation of other available funding sources, source of other funds utilized in the project, and estimated number of persons to be served by the applicant (daily average).

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**29.6(2)** No individual project may receive more than \$50,000 in a single application round.

**29.6(3)** Applicants shall apply for a minimum of \$10,000 per funding round.

**29.6(4)** Applicants may receive a maximum of \$125,000 in HSOG funds per funding cycle.

**29.6(5)** No more than one project per applicant shall be funded at any one facility or location.

**261—29.7(15) Application review process.** The following procedures will be used in the review of applications received under the homeless shelter operation grants program.

**29.7(1)** Applications will be reviewed by a panel established by the Iowa department of economic development and coordinated with representatives of other homeless assistance programs. Applications will be reviewed to determine eligibility based on the following criteria:

- a. The identified community need for the funds, including the number of clients served, the current unmet need in the community, geographic area of service, and common factors leading to the need for service. Maximum 25 points.
- b. The comprehensiveness and flexibility of the program, including how the applicant proposes to meet the total and special needs of its clients and how homeless assistance is integrated with other programs. Maximum 25 points.
- c. The accessibility of the applicant's proposed service to its clients, including how well the applicant promotes its services within the community, any barriers to service, and any networking with other service providers in the area. Maximum 15 points.
- d. How the applicant deals with cultural diversity within its community. Maximum 10 points.
- e. Any partnerships or collaborations between the applicant and other programs within the organization or with other organizations performing similar or complementary services. Maximum 15 points.
- f. A description of specific outcome measures for short- or long-term objectives for clients. An applicant's past performance, if applicable, shall be assessed in terms of its ability to meet performance targets. Maximum 25 points.
- g. How well the applicant maximizes or leverages resources. Maximum 20 points.
- h. Threshold criteria. Applicants shall demonstrate capacity for grant administrator as evidenced by previous satisfactory grant administration or by providing evidence of administrative ability to administer such a grant.

**29.7(2)** If an application contains an activity determined to be ineligible under the HSOG program, the ineligible activity will be deleted from the application or referred to another funding source, if applicable.

**29.7(3)** IDED staff reserves the right to negotiate directly with the applicant to determine the priority of funding requested within the application.

**29.7(4)** IDED staff may also review applications with the department of human rights, department of human services, or other groups with an expertise in the area of serving homeless persons before making final funding recommendations. Consultation with other agencies is intended to avoid duplication and promote maximum utilization of funding sources. Based on the review process, IDED may revise the overall funding request by activity or funding level and recommend a final funding figure to the director of IDED for approval. Applicants receiving funding will not receive less than a \$10,000 award.

**29.7(5)** A city or county government or nonprofit organization may be designated, at the discretion of IDED, to administer a contract for multiple applicants within a prescribed geographic area.

**29.7(6)** IDED reserves the right to negotiate all aspects of a funding request prior to final approval.

**29.7(7)** Applicants that receive awards will receive funding for a one-year period.

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**261—29.8(15) Matching requirement.** There is no matching requirement with the HSOG program.

**261—29.9(15) Grant awards.** Grants will be awarded to individual applicants. IDED may award a grant to a local city or county government or nonprofit organization on behalf of multiple applicants, at the discretion of IDED and with the approval of those applicants affected and the local governmental unit or nonprofit organization. If a city or county or nonprofit organization is designated as the grantee of an award, that city or county or nonprofit organization will be responsible for coordination of requests for funds by eligible private nonprofit recipients within its jurisdiction by consolidating them into one contract between the local governmental unit or nonprofit organization and IDED. IDED reserves the right to negotiate the amount of the grant award, the scale of the project, and alternative methods for completing the project.

**261—29.10(15) Compliance with applicable federal and state laws and regulations.** All grantees shall comply with the Iowa Code governing activities performed under this program. Use of HSOG funds must comply with the following nondiscrimination and equal opportunity requirements:

1. The requirements of Title VIII of the Civil Rights Act of 1968, 42 U.S.C. 3601-19 and implementing regulations; Executive Order 11063 and implementing regulations at 24 CFR Part 107; and Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2002d) and its implementing regulations at 24 CFR Part 1.

2. Affirmative action requirements as implemented with Executive Orders 11625, 12432, and 12138 which require that every effort be made to solicit the participation of minority and women business enterprises (MBE/WBE) in governmental projects.

3. The prohibitions against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101-07).

4. The prohibitions against discrimination against disabled individuals under Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act.

5. Recipients shall participate in the HUD-approved Homeless Management Information System (HMIS) developed by IDED as required in the executed contract.

**261—29.11(15) Administration.**

**29.11(1) Contracts.** Upon selection of an application for funding, IDED will issue a contract.

The contract shall be between IDED and the designated grantee as determined by IDED. If a local city or county government or nonprofit organization is designated as the grantee, the private nonprofit providers covered through the contract shall remain responsible for adherence to the requirements of the HSOG program, including these rules. These rules and state laws and regulations become part of the contract. Certain activities may require that permits or clearances be obtained from other state or federal agencies prior to proceeding with the project. Grant awards may be conditioned upon the timely completion of these requirements.

**29.11(2) Record keeping and retention.** Financial records, supporting documents, statistical records, and all other records pertinent to the grant program shall be retained by the grantee for three years. Private nonprofit recipients covered through an HSOG contract from a local city or county government or nonprofit organization are responsible for ensuring that pertinent records of their HSOG funds be made available to the administering city or county or nonprofit organization and to IDED upon request. Proper record retention must be in accordance with the following:

a. Records for any assisted activity shall be retained for three years after final closeout and, if applicable, until audit procedures are completed and accepted by IDED;

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b. Representatives of the state auditor's office and IDED shall have access to all books, accounts, documents, records, and other property belonging to or in use by a grantee pertaining to the receipt of assistance under these rules.

**29.11(3) Reporting requirements.** Grantees shall submit reports to IDED as prescribed in the contract. These reports are:

a. *ServicePoint data reports.* All recipients of HSOG funds are required to submit monthly reports on clients served using the ServicePoint reporting process as prescribed by IDED; provided, however, that a recipient that qualifies as a domestic violence shelter shall not be required to report personally identifiable information about its homeless domestic violence clients. "Personally identifiable information" shall include any information that the reporting domestic violence shelter reasonably determines could be used to identify a particular client.

b. *HSOG Form-1, Request for Funds.* Grantees must submit requests for funds as needed during the contract year as prescribed by IDED. IDED may perform any review or field inspections it deems necessary to ensure program compliance, including review of grantee records and reports. When problems of compliance are noted, IDED may require remedial actions to be taken. Failure to respond to notifications of need for remedial action may result in the implementation of 29.11(5).

**29.11(4) Amendments to contracts.** Contracts may be amended on an individual basis in emergency situations. Any request to amend a contract must be submitted in writing to IDED by the chief elected official. IDED will determine if the request to amend is justified based on the material presented

in the letter of request. No amendment is valid until approved in writing by IDED.

**29.11(5) Remedies for noncompliance.** At any time before project closeout, IDED may, for cause, find that a grantee is not in compliance with the requirements under this program. At IDED's discretion, remedies for noncompliance may include the following:

- a. Issue a warning letter that further failure to comply with program requirements within a stated period of time will result in a more serious action.
- b. Condition a future grant.
- c. Direct the grantee to stop incurring costs with grant funds.
- d. Require that some or all of the grant amounts be remitted to the state.
- e. Reduce the levels of funds the recipient would otherwise be entitled to receive.
- f. Elect not to provide future grant funds to the recipient until appropriate actions are taken to ensure compliance. Reasons for a finding of noncompliance include, but are not limited to: the grantee's use of program funds for activities not described in its application, the grantee's failure to complete approved activities in a timely manner, the grantee's failure to comply with any applicable state rules or regulations, or the lack of continuing capacity by the grantee to carry out the approved program in a timely manner.

These rules are intended to implement Iowa Code section 15.108(11).

[Filed 6/18/99, Notice 4/7/99—published 7/14/99, effective 8/18/99]

[Filed 12/22/00, Notice 11/15/00—published 1/10/01, effective 2/14/01]

[Filed 3/29/01, Notice 2/7/01—published 4/18/01, effective 5/23/01]

[Filed 11/21/02, Notice 9/18/02—published 12/11/02, effective 1/15/03]

[Filed emergency 10/22/04 after Notice 9/15/04—published 11/10/04, effective 10/22/04]

[Filed emergency 12/16/04—published 1/19/05, effective 12/16/04]



# ESG Deskguide Section 3

## Eligible Activities under the ESG Program

As described in Section One of this Guide, the ESG program aims to supplement State, local, and private efforts to improve the quality and number of emergency shelters and transitional facilities for homeless people. More specifically, States and local governments use ESG funds to help operate these facilities, to provide essential support services to residents, and to help prevent at-risk families or individuals from becoming homeless.

Designed as a first step in a continuum of care plan of assistance, the ESG program strives to address the immediate needs of persons residing on the street and needing emergency shelter and transitional housing, as well as assisting their movement to independent living.

ESG serves a variety of homeless persons and families, with no restrictions or further targeting. Any targeting of ESG funds results from local service and shelter providers design of programs to address the specific needs of various homeless subpopulations, such as victims of domestic violence, youth, mentally ill, veterans, families with children, or others. A portion of ESG funds may be used to serve persons at imminent risk of losing their permanent housing and becoming homeless.

While flexible in terms of serving all homeless subpopulations and preventing persons from becoming homeless, the ESG program legislation and implementing regulations do limit the types of activities and amounts of funds that can be spent on different activities. The following five major categories of eligible activities and applicable limitations are discussed in this section of the Guide:

- ▶ Rehabilitation
- ▶ Essential Services
- ▶ Operational Costs
- ▶ Homeless Prevention Activities
- ▶ Administrative Costs

### 3.1 Emergency Shelter Renovation, Rehabilitation or Conversion

The quality and quantity of emergency shelters and transitional housing may be increased with ESG funds through conversion or major rehabilitation or renovation of existing buildings.

#### Legislation and Regulation

The legislation mentions three types of shelter improvement activities.

#### ***Eligible Activities 42 U.S.C. 11374***

*a. In General. Assistance provided under this subtitle may be used for the following activities relating to emergency shelter for homeless individuals:*

- 1. the renovation, major rehabilitation, or conversion of buildings to be used as emergency shelters*

#### **Definitions**

The regulation differentiates the three types of improvements and bases continued use restrictions for the shelter on the level of improvement.

#### ***Renovation, Rehabilitation and Conversion 24 CFR 576.3***

***Conversion*** means a change in the use of building to an emergency shelter for the homeless under this part, where the cost of conversion and any rehabilitation costs exceed 75 percent of the value of the building after conversion.

*rehabilitation.*

**Renovation** means rehabilitation that involves costs of 75 percent or less of the value of the building before renovation.

**Value of the building** means the monetary value assigned to a building by an independent real estate appraiser, or as otherwise reasonably established by the grantee or the State recipient.

### **Use Restrictions on Renovation, Major Rehabilitation, and Conversion**

The statute and regulation require certain continued use standards for shelters receiving ESG funds for improvement based upon the amount of the improvement.

### **Certifications on Use of Assistance 42 U.S.C. 11375 (c)**

*Each recipient shall certify to the Secretary that*

- 1. it will -*
  - a. in the case of assistance involving major rehabilitation or conversion, maintain any building for which assistance is used under this part as a shelter for homeless individuals and families for not less than a 10-year period; or*
  - b. in the case of assistance involving rehabilitation (other than major rehabilitation or conversion), maintain any building for which assistance is used under this part as a shelter for homeless individuals and families for not less than a 3-year period;*
- 2. any renovation carried out with assistance under this subtitle shall be sufficient to ensure that the building involved is safe and sanitary.*

► Major rehabilitation and conversion are defined as the costs of improvement that are more than 75 percent of the value of the building before rehabilitation. A shelter receiving this level of improvement must be used as a shelter for at least 10 years.

► Renovation is defined as the costs of improvements that are less than 75 percent of the value of the building before rehabilitation. A shelter receiving this level of improvement must be used as a shelter for at least 3 years.

### **Timing of Three or Ten Year Use Requirement**

The regulation specifies the dates for determining when the 3- and 10-year use requirements begin.

### **Use as an Emergency Shelter 24 CFR 576.63**

- b. Calculating the applicable period. The 3- and 10- year periods applicable under paragraph (a) of this section begin to run:*
  - 1. In the case of a building that was not operated as an emergency shelter for the homeless before receipt of grant amounts under this part, on the date of initial occupancy as an emergency shelter for the homeless.*
  - 2. In the case of a building that was operated as an emergency shelter before receipt of grant amounts under this part, on the date that grant amounts are first obligated for the shelter.*

Thus, for either the 3- or 10-year period of use, the use requirement starts on the date of initial occupancy for a building that had not previously been operated as a shelter. The date the ESG funds are obligated to a shelter starts the applicable use requirement where the building was previously operated as a shelter.

## Ineligible Activities

Ineligible rehabilitation or renovation costs include:

- ▶ Acquisition of real property
- ▶ New construction
- ▶ Property clearance or demolition
- ▶ Rehabilitation administration
- ▶ Staff training or fund raising activities associated with rehabilitation
- ▶ Building maintenance and repairs (See Operations)

[Please note that acquisition and new construction are not eligible ESG-funded activities, and Davis-Bacon requirements do not apply to ESG-funded renovation, major rehabilitation or conversion activities.]

## Lead-Based Paint Requirements

The application of lead-based paint regulations to facilities receiving ESG funds is discussed in detail in Section Eight.

### 3.2 Essential Services

ESG funds can be used to provide essential services to address the needs of homeless persons living on the street, in emergency shelter or in transitional housing. Essential services can address the immediate needs of the homeless, and can help enable homeless persons become more independent and to secure permanent housing.

## Legislation and Regulation

The legislation describes several types of essential service activities:

### ***Eligible Activities 42 U.S.C. 11374***

- a. In General. Assistance provided under this subtitle may be used for the following activities relating to emergency shelter for homeless individuals:*
  - 2. The provision of essential services, including services concerned with employment, health, drug abuse or education.*

The law specifies a broad array of services available to serve homeless persons who are residing in emergency and transitional shelters. In addition, essential services for homeless persons may be funded in day shelters or soup kitchens that are designed to serve predominantly homeless persons. Finally, services provided by shelters or day shelters that address the needs of persons residing on the street may be funded by ESG.

## Definitions

### ***Essential Services 24 CFR 576.3***

*Essential services includes services concerned with employment, health, drug abuse, and education and may include (but are not limited to):*

- 1. Assistance in obtaining permanent housing;*
- 2. Medical and psychological counseling and supervision;*
- 3. Employment counseling;*
- 4. Nutritional counseling;*

5. *Substance abuse treatment and counseling;*
6. *Assistance in obtaining other Federal, State and local assistance including mental health benefits; employment counseling; medical assistance; Veteran's benefits; and income support assistance such as supplemental Security Income benefits, Aid to Families with Dependent Children, General Assistance, and Food Stamps;*
7. *Other services such as child care, transportation, job placement and job training; and*
8. *Staff salaries necessary to provide the above services.*

## **Limitations on Funding Essential Services**

The legislation and the regulations both limit the amount of ESG funds that may be spent on essential services (30 percent subject to waiver) and restrict funding to new services or a quantifiable increase in services above the level previously funded.

### ***Eligible Activities 42 U.S.C. 11374 (a) (2)***

2. *The provision of essential services, including services concerned with employment, health, drug abuse, or education, if -*
  - A. *such services have not been provided by the local government during any part of the immediately preceding 12-month period; or the use of assistance under this subtitle would complement those services; and*
  - B. *not more than 30 percent of the aggregate amount of all assistance to a State or local government under this subtitle is used for activities under this paragraph.*

### ***Limitation on provision of essential services 24 CFR 576.21 (b)***

1. *Grant amounts provided by HUD to units of general local government, or territories and grant amounts provided by a State to State recipients, may be used to provide an essential service....only if the service is a new service, or is a quantifiable increase in the level of a service above that which the unit of general local government (or, in the case of a nonprofit organization, the unit of general local government in which the proposed activities are to be located), or territory as applicable, provided with local funds during the 12 calendar months immediately before the grantee or State recipient received initial grant amounts.*
2. *Limits on the use of assistance for essential services...are applicable even when the unit of local government, or territory provides some or all of its grant funds to a nonprofit recipient. This limitation may be waived in accordance with 42 U.S.C. 11374.*

## **New Service or Quantifiable Increase in Service**

ESG funds can be used by grantees or their recipients for a new service or a quantifiable increase in the level of service above that provided during the immediately previous 12-month period. This provision in the legislation prohibits using ESG funds to replace existing government or non-profit funding of services. However, once a new or increased level of service meets the above standards, then ESG funds may be used to continue funding that service in subsequent years. Examples of essential services meeting these standards are:

- ▶ A city grantee funded a recipient organization for outreach to the Hispanic homeless population in the community. Funds were used to support Spanish-speaking service staff, and translation of written materials into Spanish. This was a new service as this population had not been directly provided these services before and no other organization was providing these services at the time.
- ▶ A city grantee funded a local food rescue/soup kitchen organization to purchase an additional vehicle to be used to transport rescued foods from restaurants to area shelters and feeding programs. This activity represented a

quantifiable increase in the level of service as it increased the organizations' transport fleet by one additional vehicle and allowed for a substantial increase in the number of organizations served by the program. In this case, no other area organization was providing this service.

- ▶ A city grantee funded a new staff position to provide housing search services for transitional shelter residents. The services provided by this new position were new, and enhanced (or increased) the ability of local shelters to assist residents to move from temporary shelter to permanent housing.

The examples provided above are in no way exhaustive, but simply provide three illustrations of how ESG funding was used in the essential services category. As is demonstrated, salaries for supportive services provider staff are an eligible cost under this category.

### **Essential Services 30 Percent Limitation**

Grantees may use only thirty (30) percent of the entire ESG grant for essential services. For example, a jurisdiction receiving a \$200,000 ESG grant may only use \$60,000 (or 30 percent) for essential services. The 30 percent limitation applies to the grant as a whole. Thus, individual recipients of ESG funds for essential services are each not limited to 30 percent of their grant, just as long as the overall 30 percent limit is not exceeded.

### **Waiver of Statutory 30 Percent Essential Services Limitation**

The legislation provides for a waiver of the statutory 30 percent limitation.

#### ***Waiver Authority 42 U.S.C. 11374 (b)***

*The Secretary may waive the 30 percent limitation on the use of assistance for essential services contained in subsection (a)(2)(B) of this section, if the local government receiving the assistance demonstrates that the other eligible activities under the program are already being carried out in the locality with other resources.*

The jurisdiction requesting a waiver of the 30 percent limitation must document to the satisfaction of HUD that other ESG-eligible activities (renovation, major rehabilitation, conversion, operational costs, and homeless prevention) are being carried out in the locality with other resources or there is no demand for those activities.

### **Ineligible Activities**

Ineligible essential services costs include:

- ▶ Existing services and staff (services must be new or provided to more persons)
- ▶ Salary of case management supervisor when not working directly on participant issues
- ▶ Advocacy, planning, and organizational capacity building
- ▶ Staff recruitment/training
- ▶ Transportation costs not directly associated with service delivery

### **3.3 Operational Costs**

ESG funds can cover a broad array of emergency shelter and transitional housing operating costs.

### **Legislation and Regulations**

The legislation and regulations specify various eligible operating costs related to the provision of emergency and transitional housing.

#### ***Eligible Activities 42 U.S.C. 11374 (a)***

3. *Maintenance, operation, insurance, utilities and furnishings, except that not more than 10 percent of the amount of any grant received under this subtitle may be used for costs of staff.*

#### ***Definitions 42 U.S.C. 11371***

4. *The term "operating costs" means expenses incurred by a recipient operating a facility assisted under*

*this subtitle with respect to -*

- A. the administration, maintenance, repair, and security of such housing; and*
- B. utilities, fuels, furnishings, and equipment for such housing.*

**Eligible Activities 24 CFR 576.21 (a) (3)**

- 3. Payment for shelter maintenance, operation, rent, repairs, security, fuel, equipment, insurance, utilities, food and furnishings. Not more than 10 percent of the grant amount may be used for costs of staff.*

**Limitations on Funding Operational Costs**

Staff salaries (including fringe benefits) paid under the operating costs category are limited to 10 percent of the grant. Maintenance and security salary costs are not subject to the 10 percent standard. For example, a grantee receiving a \$75,000 ESG grant would be able to pay only \$7,500 (or 10 percent of that amount) for operational staff costs.

**Ineligible Activities**

Ineligible operating or maintenance costs include:

- ▶ Recruitment or on-going training of staff
- ▶ Depreciation
- ▶ Costs associated with the organization rather than the supportive housing project (advertisements, pamphlets about organization, surveys, etc.)
- ▶ Staff training, entertainment, conferences, or retreats
- ▶ Public relations or fund raising
- ▶ Bad debts/late fees
- ▶ Mortgage payments

**3.4 Homeless Prevention Activities**

The legislation and the regulations specify a broad array of financial assistance and supportive services that may be provided to help prevent persons from becoming homeless.

**Legislation and Regulation**

**Eligible Activities 42 U.S.C. 11374 (a)**

- 4. Efforts to prevent homelessness such as financial assistance to families who have received eviction notices or notices of termination of utility services if -*
  - A. the inability of the family to make the required payments is due to a sudden reduction in income;*
  - B. the assistance is necessary to avoid the eviction or termination of services;*
  - C. there is a reasonable prospect that the family will be able to resume payments within a reasonable period of time; and*
  - D. the assistance will not supplant funding for preexisting homelessness prevention activities from other sources.*

*Not more than 30 percent of the aggregate amount of all assistance to a State or local government under this*

*subtitle may be used for activities under this paragraph.*

### **Definitions 24 CFR 576.3**

*Homeless prevention means activities or programs designed to prevent the incidence of homelessness, including (but not limited to):*

- 1. Short-term subsidies to defray rent and utility arrearages for families that have received eviction or utility termination notices;*
- 2. Security deposits or first month's rent to permit a homeless family to move into its own apartment;*
- 3. Mediation programs for landlord-tenant disputes;*
- 4. Legal services programs for the representation of indigent tenants in eviction proceedings;*
- 5. Payments to prevent foreclosure on a home; and*
- 6. Other innovative programs and activities designed to prevent the incidence of homelessness.*

### **Eligible Activities 24 CFR 576.21 (a) (4)**

*Developing and implementing homeless prevention activities, subject to the limitations in 42 U.S.C. 11374(a)(4) and paragraph (c) of this section. Grant funds may be used under this paragraph to assist families that have received eviction notices or notices of termination of utility services only if the conditions stated in 42 U.S.C. 11374(a)(4) are met.*

### **Limitations on Funding Homeless Prevention Activities**

The grantee may not use more than thirty (30) percent of their grant amount for homeless prevention activities. The statutory limitation is not waivable. The limitation is based on the overall grant to the jurisdiction. An individual recipient's homeless prevention activities are not limited, as long as the total of all recipients' homeless prevention activities does not exceed the 30 percent standard.

### **Prevention Limitations 24 CFR 576.21**

*(c) Limitation on homeless prevention activities. Limits on the use of assistance for homeless prevention activities established in 42 U.S.C. 11374(a)(4) are applicable even when the unit of local government or territory provides some or all of its grant funds to a nonprofit recipient.*

### **Ineligible Activities**

Ineligible homeless prevention costs include:

- ▶ Housing/services to homeless persons
- ▶ Direct payments to individuals
- ▶ Long-term assistance beyond several months
- ▶ Application for Federal Funds or Unprogrammed Funds

### **3.5 Administrative Costs**

The legislation and regulations provide that up to five (5) percent of a grantee's funds may be spent for administering the grant.

### **Legislation and Regulation**

#### **Administrative Costs 42 U.S.C. 11378**

*A recipient may use up to 5 percent of any annual grant received under this part for administrative purposes. A*



*recipient State shall share the amount available for administrative purposes pursuant to the preceding sentence with local governments funded by the State.*

**Eligible Activities 24 CFR 576.21 (a) (5)**

5. *Administrative costs in accordance with 42 U.S.C. 11378.*

Eligible administrative costs include staff to operate the program, preparation of progress reports, audits, and monitoring of recipients.

**Sharing of Administrative Funds**

The legislation directs that a State share its administrative funds with local governments who receive grants from the State.

**Ineligible Activities**

Ineligible administrative costs include:

- ▶ Preparation of Consolidated Plan and other application submissions
- ▶ Conferences or training in professional fields such as accounting and financial management
- ▶ Salary of organization's executive director (except to the extent involved in carrying out eligible administrative functions)

**3.6 Summary of Eligible ESG-Funded Activities and Limits on Use**

Eligible Activity	Limitation/Restriction on Use
Renovation, Major Rehabilitation and Conversion	Renovation: Continue use as shelter for 3 yearsMajor Rehab/Conversion: Continue use as a shelter for 10 years
Essential Services	Up to 30% of ESG funding
Operational Costs	Staff costs included in this category up to 10% of ESG funding
Homeless Prevention Activities	Up to 30% of ESG funding
Administrative Costs	Up to 5% of ESG funding

While the ESG federal regulation at 24 CFR 576.21 does not list all of the possible eligible activity costs under the program, there is a statutory requirement that ESG funds must benefit either homeless persons, or persons at imminent risk of becoming homeless in the case of homeless prevention activities. An additional requirement exists that costs be provided at a reasonable price and be directly related to an ESG eligible expenditure category.

In addition, grantees and recipients should use ESG funds as originally planned in the Consolidated Plan. If it is necessary to make a change in planned activities, then the grantee should notify the HUD Field Office staff of the change. Based on the magnitude of the proposed changes, grantees may also need to amend their Consolidated Plan, alter their project or activities in IDIS, and modify any inaccurate report.